

Decision 00-09-036 September 7, 2000

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Proposed Policies Governing
Energy Efficiency, Low Income Assistance
Renewable Energy and Research, Development
and Demonstration.

Rulemaking 98-07-037
(Filed July 23, 1998)

**INTERIM OPINION: LOW-INCOME ASSISTANCE
PROGRAM POLICIES FOR PROGRAM YEAR 2001 AND
STANDARDIZATION PROJECT (PHASE 1)**

(See Attachment 1 for Appearances)

TABLE OF CONTENTS

Title	Page
INTERIM OPINION: LOW-INCOME ASSISTANCE PROGRAM POLICIES FOR PROGRAM YEAR 2001 AND STANDARDIZATION PROJECT (PHASE 1).....	1
1. Summary	2
2. Background and Procedural History	4
3. LIAB's Compliance with Commission Directives	7
4. LIAB's Recommendations For PY 2001 Programs.....	12
CARE and LIEE Mission Statements	12
Outreach.....	14
Leveraging and Coordination with other Organizations and Programs	15
Standardizing Weatherization Programs.....	16
Specific Program Recommendation 1.....	16
Specific Program Recommendation 2.....	18
Specific Program Recommendation 3.....	21
Specific Program Recommendation 4.....	21
Specific Program Recommendation 5.....	22
Specific Program Recommendation 6.....	23
Specific Program Recommendation 7.....	25
Specific Program Recommendations 8, 9, 10 and 11	27
Specific Program Recommendations 12, 13, 14 and 15	30
Specific Program Recommendation 16.....	31
Specific Program Recommendation 17.....	32
Specific Program Recommendation 18.....	32
Specific Program Recommendation 19.....	33
Specific Program Recommendation 20.....	35
Specific Program Recommendation 21.....	36
Specific Program Recommendation 22.....	37
Specific Program Recommendation 23.....	38
Specific Program Recommendation 24.....	39
Specific Program Recommendation 25.....	40
Specific Program Recommendation 26.....	41
Specific Program Recommendation 27.....	41
Specific Program Recommendation 28.....	42

5.	LIEE Standardization Project Report (Phase 1)	44
6.	Further Direction For LIAB	47
7.	Compliance Applications	52
8.	Comments on Draft Decision.....	54
INTERIM ORDER		61
ATTACHMENT 1: APPEARANCES		
ATTACHMENT 2: LIST OF ACRONYMS		

1. Summary¹

By today's decision we approve the utilities' joint Phase 1 recommendations for standardizing installation standards and other procedures for the Low-Income Energy Efficiency (LIEE) program.² These recommendations are contained in the Phase 1 Report on the LIEE Standardization Project submitted on May 8, 2000 and augmented on July 5, 2000.

Within 30 days of the effective date of this decision, the utilities should jointly file the new weatherization installation standards manual which incorporates both the Phase 1 report recommendations and the follow-up recommendations submitted on July 5, 2000. The utilities should serve a notice of its availability to all appearances and the state service list in this proceeding. This new manual should be used by the utilities in designing their Program Year (PY) 2001 programs, and will become the standard used for all installations in the utility programs beginning January 1, 2001.

As discussed in this decision, the utilities should jointly develop and present a standardized methodology for calculating penetration rates in their PY 2001 applications. We intend to utilize a standardized approach to calculating penetration rates in the evaluation of the California Alternate Rates for Energy (CARE) program overall, as well as the CARE Outreach Pilot.

In addition, we direct the utilities to describe their current procedures (audits, process evaluations, polls, etc.) for monitoring program quality, cost

¹ Attachment 2 explains each acronym or other abbreviation that appears in this decision.

² "The utilities" refers collectively to Pacific Gas and Electric (PG&E), San Diego Gas & Electric (SDG&E), Southern California Edison (SCE) and Southern California Gas Company (SoCal).

efficiency and customer satisfaction for low-income assistance programs. The utilities should present recommendations for improving these procedures or instituting alternative ones, along with the associated costs and manpower requirements. The utilities should also present recommendations regarding stand-alone attic ventilation based on the results of the Attic Insulation Outreach Pilot.

The information described above should be presented by the utilities in compliance applications, to be filed within 60 days from the effective date of this decision. We have already authorized the continuation of the utilities PY 2000 programs and funding through December 31, 2001, and, therefore, no further action is necessary to extend the current programs through 2001. As discussed in this decision, we conclude that further modifications to current programs are not warranted at this time.

We also direct the utilities to develop a standardized customer “bill of rights,” including a description of the consumer complaint process, in coordination with some of the issues being addressed in Phase 2 of the Standardization Project. The utilities should jointly develop this document with public input, and present it for our approval no later than the filing of their PY 2002 program applications.

The utilities should also work toward the development of a form that requests the same types and categories of data from all customers enrolling in CARE. The utilities should jointly develop such forms with public input and present them in an Advice Letter filing by March 1, 2001. This will enable us to authorize new forms in time for the June 1 implementation of the new income levels that are developed each year.

We direct the Standardization Project team to explore the Low-Income Advisory Board’s (LIAB) Specific Program Recommendations 20, 21 and 28

during the ongoing development of standardized policies and program procedures. We reiterate our expectation that the Standardization Project team's recommendations regarding these issues will be presented to the Commission in time for consideration during the PY 2002 program planning cycle.

Finally, we provide further direction to LIAB regarding its role and assignments. In particular, we clarify what activities are (and are not) assigned to LIAB or its advisory committee in the near term, for which Energy Division will continue to provide assistance. If LIAB desires to meet more frequently or perform additional activities with the assistance of Commission resources, we direct LIAB to seek and receive approval from the Energy Division.

2. Background and Procedural History

Utilities currently implement two types of assistance to low-income residents: rate assistance and energy efficiency services. Under the CARE program, eligible low-income households and group living facilities receive up to a 15% rate discount for their electric and gas consumption. Under the LIEE program, direct assistance is provided to low-income customers in the form of energy efficiency education and the installation of energy efficient measures and appliances in the home.

By ruling dated March 26, 1999, the Assigned Commissioner described the program planning process for PY 2001 low-income assistance programs. The Assigned Commissioner directed LIAB, formerly the Low-Income Governing Board (LIGB), to initiate the process, as follows: ³

³ The terms "Board," "LIGB," and "LIAB" are used interchangeably in this decision to refer to the Advisory Board on low-income assistance programs established by the Commission in D.97-02-014.

“Based on public input, LIGB would propose selective changes to policy rules guidelines on programs, budgets and program administrative issues that would apply to low-income assistance programs for PY2001 or longer. LIGB’s proposal would be filed in this or a successor proceeding. Interested parties would have an opportunity to respond to LIGB’s recommendations, and the Commission would issue a decision in this proceeding addressing any disputed issues. Utilities would follow with applications to implement these changes.”⁴

By ruling dated December 29, 1999, the Assigned Commissioner further directed that the PY 2001 planning process include specific proposals for standardizing elements of the low-income assistance program, consistent with the direction Decision (D.) 99-03-056. Specifically, the Assigned Commissioner directed the utilities “to work jointly with any interested participants to develop a joint proposal for standardizing the selection criteria and installation manuals for the utilities’ low-income weatherization programs.”⁵ To that end, the utilities were expected “to conduct workshops and/or other forums to solicit input from interested participants prior to serving the joint proposal.”⁶ On March 22, 2000, the Assigned Commissioner provided further guidance:

“Under this project, the utility policy and procedures manuals and weatherization installation standards manuals shall be reviewed and standardized statewide. These manuals contain rules on how and when measures are to be installed in low-income homes, detailed measure descriptions, material

⁴ Assigned Commissioner’s Ruling Regarding PY 2000/2001 Planning, dated March 26, 1999, p. 7.

⁵ Assigned Commissioner’s Ruling Regarding PY 2001 Planning, dated December 29, 1999, p. 2.

⁶ *Ibid.* p. 3.

standards, measure installation instructions, and other implementation procedures. A single state-wide utility program [Weatherization Installation Standards] manual shall be developed, along with a set of standardized policy and procedure manuals. These policy and procedure manuals shall differ only with respect to differences in climatic conditions, local building codes and ordinances. Where prior Commission rulings allow differences across utilities, I expect participants to consider ways of achieving reasonable consistency.

“The review of [Policy and Procedures] Manuals shall cover not only issues relating to installation standards, but also other policies and procedures that differ across programs. This would include spending caps, approaches to income qualifications, treatment of rental units, etc. I also expect the utilities to achieve greater consistency in the area of carbon monoxide testing through this review process, thus ensuring customer protection.

“In addition, the debate in [Application] 99-07-002 et al. convinces me that there is a need to improve consistency across utilities with regard to inspection policies and procedures for the low-income energy efficiency program. Standardization of inspection procedures should be undertaken as a second (or concurrent) phase of this project.”⁷

LIAB filed its initial recommendations for PY 2001 low-income assistance programs on May 10, 2000 with a replacement filing containing Board-approved edits on May 19, 2000. Comments on LIAB’s recommendations were filed on June 5, 2000 by SCE and jointly by SDG&E/SoCal. LIAB filed reply comments on June 12, 2000.

⁷ Assigned Commissioner’s Ruling Regarding Joint Utility Weatherization Installation Standards and Policy and Procedures Manuals Standardization Project, dated March 22, 2000, pp. 1-2.

Also on May 10, 2000, Pacific Gas and Electric Company (PG&E), SDG&E, SCE and SoCal (collectively, “the utilities”) jointly filed a Phase 1 Report on the Low-Income Weatherization Installation Manual Standardization Project (“Standardization Project”).

By ruling dated May 24, 2000, the assigned Administrative Law Judge (ALJ) requested clarification from LIAB concerning its PY 2001 recommendations. She noted that there appeared to be considerable overlap between those recommendations and the issues being addressed through the Standardization Project. In addition, she noted that LIAB made recommendations on at least one issue that was being addressed in Application (A.) 99-07-002 et al. The assigned ALJ requested that LIAB clarify where there are still differences between LIAB and the utilities regarding standardization issues.

On June 9, 2000, LIAB filed comments on the Standardization Project joint report and responded to the ALJ’s request for clarification. No parties filed a response.

On July 5, 2000, the utilities submitted Phase 1 follow-up recommendations for the Standardization Project which responded to comments received from interested parties during the Phase 1 proposal public review. The assigned ALJ issued a ruling on July 13, 2000 soliciting comments on those additional recommendations. The Office of Ratepayer Advocates (ORA) filed comments in support of the follow-up recommendations.

3. LIAB’s Compliance with Commission Directives

Before turning to the specifics of LIAB’s recommendations, we first address SDG&E/SoCal’s contention that LIAB’s filing is deficient because it fails to meet the requirements of D.99-03-056, D.00-02-045, and the March 26, 1999

Assigned Commissioner's Ruling. In particular, SDG&E/SoCal argues that LIAB provides no support for why its PY 2001 recommendations should be given high priority consideration and does not comply with the Commission's directive that its PY 2001 recommendations must be based on sufficient public input. SDG&E/SoCal also argues that the filing is deficient because there is no discussion of the pros and cons of the LIAB's recommendations or any discernable consideration of the interests of all stakeholders, including ratepayers.

In response, LIAB states the following:

"The genesis of the Board's program year (PY) 2001 recommendations was the submission of Proposed Policy Rules in November 1998 and final submission on December 23, 1998 of the Board's Proposed Request for Proposal (RFP) for Independent Administration. The Board approved the basic framework of the earlier work, with some updating and modification during meetings in March, April and May of this year. Discussion points for the Board's recommendations, which were the basis of the Board's May 10th submittal, were circulated prior to and during the Board's meetings of March 28, 2000, April 11 and 12, 2000 and May 2 and 3, 2000. At its May 3, 2000 meeting, the Board voted unanimously to adopt the Discussion Points of the PY 2000 document as revised by the Board and authorized Stephen Rutledge to make the final edits, per the Board's direction and submit the recommendations on the Board's behalf. Since 1998, this Board committed itself to, and did, in the face of tremendous obstacles, have full public discussion on each and every one of these points, and at each point the delegated representative of each and every utility was present and participated in those discussions."⁸

⁸ Reply Comments of the LIAB, dated June 12, 2000, p. 2.

Based on LIAB's response, it does appear that LIAB solicited public input in developing its PY 2001 recommendations. However, LIAB's filing does not reflect the nature of that input, or the alternatives that LIAB considered in developing its selected recommendations. Therefore, it is impossible for us to ascertain whether such public input was sufficient or effective. We expect there to be constructive dialogue among LIAB Board members and public participants during public meetings, as well as serious consideration of all the options presented to the Board. During the PY 1999 program planning cycle, we clearly expressed these expectations:

"The Commission is disappointed in the degree to which the LIGB sought feedback and suggestions from the utilities and other interested parties, and the LIGB's apparent lack of evaluation and analysis of such feedback before making its recommendations to the Commission. In the future, the LIGB is expected to solicit comments and recommendations from the utilities and interested parties and adopt a timeline which allows for evaluation and incorporation of these responses, as appropriate. The LIGB, in the future, should provide thorough substantiation of its recommendations in its work products."⁹

In D.00-02-045, we directed that LIAB provide to the Commission "at a minimum" its best advice agreeable to the majority of Board members, "along with some discussion of the rationale or pros and cons associated with the Board's recommendations." (D.00-02-045, mimeo., p. 24.) We also encouraged LIAB to provide "additional context around recommendations where appropriate and possible. For example, if the Board considered a list of options, it would be useful if the forgone alternatives, along with the pros and cons of

⁹ Resolution (Res.) E-3585, dated December 17, 1998, p. 27. See also Ordering Paragraphs 13 and 14.

each, were also communicated to the Commission.” (*Id.* See also, Conclusion of Law 14.)

In reviewing LIAB’s filing, we find that LIAB’s filing meets only the bare minimum of these requirements by providing a discussion of LIAB’s rationale for each recommendation. LIAB did not present any significant discussion of forgone alternatives (presumably some of which would have been suggested by the utilities and other public participants), or the pros and cons of each, as we encouraged LIAB to do in D.00-02-045. Moreover, LIAB did not explain how it evaluated the relative ranking of proposals made by the public, and why its recommendations represent the top priorities for Commission consideration, as directed by the Assigned Commissioner in his ruling regarding PY 2000/PY 2001 planning.¹⁰

More specifically, the Assigned Commissioner articulated his expectations for the type of selective changes that LIAB’s filing would encompass, by referencing his instructions to the California Board For Energy Efficiency (CBEE):¹¹

“...’selected’ implies ‘limited in number’ and therefore CBEE and interested parties should focus on only the highest priority modifications for the Commission’s consideration. I believe that the following categories, among possible others, represent the type of modifications appropriate for Commission consideration: (1) changes needed to clarify aspects of our policy rules that were not addressed during the PY 1999 program process, (2) program initiatives that may have been

¹⁰ *Ibid.* pp. 3-4.

¹¹ Assigned Commissioner’s Ruling Regarding PY 2000/2001 Planning, dated March 26, 1999, p.7.

neglected because of the compressed time schedule for PY 1999 program planning....or (3) program design modifications that are needed to “fix” a problem already observed in their implementation. I am not interested in relitigating issues that were debated and addressed by the Commission...

“In its recommendations, CBEE should explain how it evaluated the relative ranking of proposals made by the public, and why its recommendations represent the top priorities for Commission consideration.”¹²

This information was not provided in LIAB’s filing. Moreover, as noted by the assigned ALJ, some of LIAB’s recommendations involve either issues that are currently being litigated during the PY 2000 planning cycle (in Application (A.) 99-07-002 et al.) or have been addressed to LIAB’s satisfaction in the joint Standardization Report.

Because LIAB did not follow the guidelines set forth by the Assigned Commissioner for the content of this filing, we find the usefulness of LIAB’s recommendations to be quite limited. Rather than reject them outright, as SDG&E/SoCal propose, we will consider whether any of them represent top priorities that should be adopted at this time. In the future, however, we will not accept filings from LIAB that do not conform to the directives set forth by this Commission, the Assigned Commissioner or the Assigned ALJ. We provide further direction to LIAB concerning our expectations in Section 6 of this decision.

¹² *Ibid.*, pp. 3-4.

4. LIAB's Recommendations For PY 2001 Programs

LIAB presents recommendations about the CARE and LIEE mission statements, program outreach, leveraging and coordination with other organizations and programs, standardizing weatherization programs, and 28 specific program recommendations. We present and discuss each of these recommendations in the following sections.

CARE and LIEE Mission Statements

LIAB proposes the following mission statements for low-income assistance programs:

The goal of the Commission concerning low-income gas and electric programs should be to assist low-income customers in securing access to affordable, essential energy services. To this end, low-income programs should provide for energy efficiency through the LIEE program, energy assistance through the CARE program, energy education, and a link with consumer protection programs in an economically efficient manner.

The fundamental purpose of the LIEE program is to help low-income customers manage their use of energy and to maximize the efficiency with which they use energy. Its goal is to reduce the usage and thus the energy hardship and bills of low-income customers.

The fundamental purpose of the CARE program is to make consumers' energy bills more affordable.

The fundamental purpose of energy education is to inform customers of the services available to them, and to educate them as to energy efficiency opportunities.

The fundamental purpose of low-income consumer protection is to ensure that: low-income ratepayers have the same opportunities and access to lower energy costs as other residential customers; provision of consumer education; and the continuation of existing consumer protections after restructuring.

SCE is concerned that the proposed mission statements may be setting policy in an area that has not had substantive public input. In particular, SCE is concerned over the use of the term “energy hardship,” since this term has not been defined by the Commission. SCE is also unclear regarding the focus or purpose of low income consumer protection as a defined program or activity by the Commission. SCE views the existence of the current LIEE and CARE programs as an outgrowth of consumer protection and equity concerns. In any event, SCE believes that LIEE’s proposed mission statements would not create the need to redesign programs in 2001. SDG&E/SoCal did not comment on this particular proposal.

We share SCE’s concerns and also note that the proposed mission statement does not reflect our stated policy of balancing the equity goals of CARE and the low-income energy efficiency programs with the need to also consider cost-efficiency. We clearly articulated this policy in our consideration of PY 2000 program proposals:

“From our perspective, consideration of the issues in this case must focus on the interests of those being served by the program, low-income utility customers, and those paying for the program, non-participating ratepayers. With respect to low-income customers, we believe that their interest in the program is fundamentally the same as all customers participating in energy efficiency programs, namely, to improve the comfort of their homes and reduce energy bills. As we stated in D.97-02-014, ‘our goal is to provide low-income ratepayers with assistance in managing their energy bills.’

Because this segment of the population needs the bill savings the most, we should strive to maximize the participation of eligible participants and work to reduce their electric and gas bills as much as possible, within the constraint of limited funding. At the same time, to protect the interests of non-participating ratepayers that subsidize the costs of the program,

we need to ensure that service delivery is as efficient as possible.” (D.00-07-020, mimeo, p. 36.)

We believe that the goals and objectives for LIEE programs articulated in D.00-07-020 appropriately reflect the Commission’s intent for these programs. Adopting LIAB’s proposed mission statements may introduce ambiguity rather than clarification. For these reasons, we will not adopt them.

Outreach

LIAB presents the following recommendations regarding program outreach:

The energy utilities will be responsible for targeting, marketing and outreach to ensure that eligible populations gain an awareness and understanding of the CARE program and have access to applications and assistance (which should include multi-lingual notification and assistance). This effort should be in line with the LIAB’s goal that the CARE program achieve a 100% participation rate of eligible customers and the Legislature’s stated goal of maximizing participation of eligible households. Particular effort should be made to include hard-to-reach, limited English-speaking and vulnerable customers.

Outreach efforts could include possible partnerships or subcontracts with other agencies. All potential agents (e.g. CBOs, Community Action Agencies, non-profits, municipalities, independent contractors, etc.) should have the opportunity to compete for contracts as implementers of outreach and intake services.

The energy utilities should seek to encourage competition and creativity in the delivery of CARE services in the interest of increasing participation. This is especially the case given the geographic and cultural diversity within California. The energy utilities should provide and budget for a system of reimbursement and incentives for implementers of whatever nature, to encourage increased participation. Selection criteria for these implementers should include consideration of their ability to deliver quality services in a cost-effective manner. To

begin working towards these objectives, the energy utilities have a CARE pilot program that begins on June 1, 2000.

We expect that the Outreach Pilot currently underway will yield useful information that will enhance future outreach efforts. Under this pilot, each utility is exploring up to seven new approaches for their outreach efforts, using independent contractors. The pilot began June 1, 2000 and will continue for one year.¹³

As SCE points out, the results of the pilot will be useful for developing future reimbursement or incentives mechanisms. Rather than articulate specific expectations about outreach program enhancements for PY 2001 at this juncture, we believe that it is more prudent to await the pilot results. As discussed further below, while it is desirable to increase CARE penetration, 100% penetration may not be practicable. For these reasons, we do not adopt LIAB's recommendations regarding program outreach for PY 2001.

We direct the utilities to include in their PY 2001 program applications a description of how they are tracking the results of the Outreach Pilot so that those results can be evaluated during the PY 2002 program planning cycle.

Leveraging and Coordination with other Organizations and Programs

LIAB recommends that all of the energy utilities share appropriate CARE subsidy information with the California Department of Community Services and Development (CSD) to ensure that the maximum Federal matching funds are obtained for California low-income energy programs. As part of this process, the utilities should enter into agreements with CSD to provide referrals. LIAB also

¹³ See Res. E-3601, pp. 26-27.

recommends that, wherever possible, the energy utilities should seek to coordinate the outreach and intake processes for CARE and LIEE with other organizations assisting low-income customers.

As SCE points out, this recommendation reflects the Commission's policy direction recently articulated in D.00-07-020.¹⁴ It does not represent a high priority modification of policies or programs for our consideration.

Standardizing Weatherization Programs

LIAB recommends that the utilities continue to work towards standardizing their weatherization programs in terms of the types of measures installed, installation criteria, installation manuals, and inspection policies and procedures.

As SCE notes, the Commission already has significant standardization initiatives underway through the Weatherization Installation Standards manual, weatherization policies and procedures, and reporting requirements standardization projects that are addressing these issues.

Specific Program Recommendation 1

Under this recommendation, LIAB states that the objectives of the Commission pertaining to the design and delivery of low-income programs should be:

- ◆ To maximize partnerships between the private sector, state and local agencies, community-based organizations (CBOs), and other entities to ensure efficient and effective delivery of programs and to maximize the resources available to low-income households.

¹⁴ See D.00-07-020, mimeo., p. 80, 84

- ◆ To maximize the efficiency of program delivery and minimize overlap through the coordination of LIEE and CARE with each other and with other utility, state, and federal programs, e.g., Low-Income Home Energy Assistance Program, Universal Lifeline Telephone Service.
- ◆ To continue to leverage funds available from state and federal sources.
- ◆ To encourage local employment and job skill development.
- ◆ To maximize the participation of eligible participants.
- ◆ To work to reduce consumers' electric and gas consumption and bills.
- ◆ To deliver programs through entities sensitive to the needs of low-income (including diverse language groups) households with demonstrated successful experience delivering or having the capacity to deliver energy efficiency or low-income services.
- ◆ To ensure reasonable administrative processes for LIEE and energy assistance programs, including reasonable complaint and dispute resolution procedures.
- ◆ To provide for consideration of energy-related health, safety and comfort in the delivery of LIEE services.
- ◆ To ensure timely distribution of CARE benefits.
- ◆ To assist or refer low-income customers with any consumer protection problems in the context of energy-related services.
- ◆ To ensure that an infrastructure for training of LIEE and CARE personnel is maintained.

SDG&E/SoCal have no objections to LIAB's recommendation. SCE observes that the proposed goal to "assist or refer low-income customers with any consumer protection problems in the context of energy-related services" lacks clarity and would need to be refined to explicitly state the responsibilities of all parties prior to its adoption.

We agree with SCE's observations, and also note that last point concerning the training infrastructure seems to contradict the policy adopted in D.00-07-020, where we determined that alternative training approaches should be explored.¹⁵

As SCE points out, the remaining recommendations seem to reflect current overarching policies for these programs. These do not represent high priority modifications for the Commission's consideration for PY 2001.

Specific Program Recommendation 2

LIAB recommends that an objective of the Commission should be to maximize participation in the programs by eligible customers while minimizing use of the programs by ineligible customers. To that end, LIAB recommends that:

- ◆ The Commission should articulate a participation goal for the CARE program statewide of 100% of eligible customers who wish to participate.
- ◆ CARE customers should be made aware of LIEE and vice versa.
- ◆ Services and funds for energy assistance and LIEE should be distributed based on need.
- ◆ The application and application process should be standardized across utilities, user-friendly, simple, and streamlined, so that it does not provide a barrier to eligible customers participating in low-income programs.
- ◆ Effective, culturally sensitive outreach should be provided regarding availability of and eligibility requirements for the program to all segments of the California population, in the predominant languages spoken in California.

¹⁵ *Ibid.* pp. 49-54.

- ◆ The LIEE and CARE programs should be inclusive of all low-income customers, including hard-to-reach, limited English-speaking and vulnerable customers. Under the federal Low-Income Home Energy Assistance Program, vulnerability is defined as including elderly, disabled and families with young children.

SDG&E/SoCal contends that there is a contradiction between LIAB's recommendation that "services and funds for energy assistance and LIEE should be distributed based on need" and "programs should be inclusive of all low-income customers." In particular, because LIAB is silent on the definition of "need," SDG&E/SoCal argues that its recommendation raises, but does not resolve, several questions. For example, does the LIAB intend that customers with the greatest financial need be given priority over other low-income customers? Or should customers residing under poor housing conditions be given priority over those with the greatest financial need? Should customers with the highest energy bills be given priority over those living in poorly maintained housing? What resources can be used by utilities to identify customers with the greatest need? Should services to those customers who are of lesser need, but who have requested program services, not be provided until those customers with the greatest need have received program services?

Without knowing the LIAB's definition of "needy" and how outreach and subsequent program changes and related costs would occur, SDG&E/SoCal argues that this recommendation should not be adopted.

SCE objects to a 100% participation goal for the CARE program. While fully supporting the goal of increasing program participation, SCE argues that as we move closer to 100% penetration of eligible customers, utilities will be faced with diminishing returns on their outreach efforts to customers. Given that some low income customers are highly mobile and that some customers may not enroll

for personal reasons, it is SCE's view that 100% participation by eligible customers in CARE is unlikely.

We believe that SDG&E/SoCal's and SCE's concerns have merit and should be explored and addressed before considering LIAB's recommendation. We note that LIAB did not provide any discussion of alternate views on this recommendation in its May 19, 2000 filing, nor did LIAB respond to SDG&E/SoCal and SCE's concerns in its June 12, 2000 reply comments.

With regard to CARE participation goals, we expect to learn more from the CARE Outreach Pilot described above. In addition, our Needs Assessment Study will help to define the energy-related requirements of the low income population and whether or not the current utility programs are, or are not, meeting those needs. The study is being implemented in two phases. The purpose of the first phase is to assess and gather available information on relevant indicators of program performance and develop common methodologies across utilities. This phase is expected to be completed by mid-2001. Based on the framework resulting from the first phase, the needs assessment study will be conducted during the second phase.¹⁶ We believe that it is premature to adopt the significant change in policy recommended by LIAB with regard to "needs" prior to the completion of at least the initial findings of the first phase of the Needs Assessment Study.

None of the other components of Recommendation 2 appear to represent a change in program activity or policy for PY 2001.

¹⁶ See Res. E-3646, dated March 16, 2000, which directed the Energy Division to conduct, facilitate and manage this study. (Ordering Paragraph 1.a.)

Specific Program Recommendation 3

LIAB recommends that the Commission acknowledge the extensive and capable energy efficiency training resource within the utilities and that these resources be preserved to provide ongoing training to all LIEE program implementers.

SDG&E/SoCal supports this recommendation. However, as the assigned ALJ noted in her May 24, 2000 ruling, this recommendation was presented by LIAB in A.99-07-002 et al. and was addressed in D.00-07-020. In that decision, we determined that the issue of whether utilities should continue to train LIEE contractors at utility facilities needs to be further examined from a cost-efficiency standpoint.¹⁷ Therefore, this recommendation has already been addressed by the Commission.

Specific Program Recommendation 4

LIAB recommends that the selection of energy efficiency measures and programs for low-income customers be based on a combination of quantifiable economic cost-effectiveness tests, non-quantifiable and non-economic factors, and administrative cost-efficiency. To this end, LIAB recommends that the Modified Participant Test, using a societal discount rate, be adopted for the measure of program cost-effectiveness.

SDG&E/SoCal and SCE argue that approving this recommendation at this time would pre-judge the work to be performed by the Reporting Requirements Manual Working Group (Working Group).

This established Working Group usually consists of the ORA, Energy Division and representatives of the major utilities but is open to the public. By

¹⁷ *Ibid.*, pp. 52-54.

ruling dated April 28, 2000, the Assigned Commissioner directed the Working Group to address proposals for evaluating program cost-effectiveness and present recommendations on unresolved issues to the Commission for resolution. The Working Group report will be submitted to the Commission on October 1, 2000 so that the Commission can address any outstanding nonconsensus issues in time for the utilities to incorporate new reporting requirements into their May 1, 2001 Annual Reports. As discussed in Section 6, LIAB's recommendations on these issues are available to the Working Group and LIAB may comment on the Working Group report, pursuant to the Assigned Commissioner's ruling.

We agree that LIAB's Recommendation 4 is premature and will defer consideration of this issue until we obtain the Working Group report.

Specific Program Recommendation 5

LIAB recommends that, for the year 2001 and beyond, the energy utilities provide the prescribed efficiency measures to low-income customers, including some or all of the "Big Six" as well as other measures that have been added to the list of prescriptive measures consistent with the revisions to the statewide weatherization installation manual.¹⁸ The Board recommends that the "Big Six" be subjected to the same selection criteria proposed for other measures in the year 2001 and beyond. Furthermore, the Board recommends that "Big Six" measures failing the selection criteria for specific climate zones not be installed in those zones.

¹⁸ The "Big Six" measures are: attic insulation, caulking, weatherstripping, low-flow shower heads, water heater insulating blankets and building envelope repairs which reduce air filtration. These are the weatherization measures specifically identified in Public Utilities Code Section 2790.

SCE believes this recommendation is consistent with standardization efforts that currently are underway. In its June 9, 2000 comments on the joint Standardization Project report, LIAB states that this recommendation is now consistent with the joint proposal.

Specific Program Recommendation 6

LIAB recommends that the Commission establish a process for adding energy efficiency measures to, or removing them from, the prescriptive list of measures available to low-income customers for the year 2001 and beyond.

SCE concurs there should be a process that will facilitate public input for determining whether to add or delete measures. SCE believes that this process should be in place and well understood by all interested parties for the PY 2002 planning cycle. Until then, no measures should be added or deleted.

SDG&E/SoCal believes that such a process already exists per D.99-03-056 and the March 26, 1999 Assigned Commissioner's ruling.

The Phase 1 Report acknowledges that there are cross-utility differences in measure eligibility and that it would be useful to have a set of consistent statewide criteria to be used for evaluating the addition and/or deletion of measures from programs. These criteria relate to determining overall measures and not the criteria for the installation of eligible measures in a specific home. The report contains a recommendation that "a formal structured test be implemented that incorporates both cost-effectiveness and judgmental indicators of hardship" and also offers specific recommendations with respect to the design of this measure selection test.¹⁹ No program measures were added or deleted in

¹⁹ Phase 1 Report, pp. 3-6 to 3-7.

the Phase 1 recommendations. For the future, the Phase 1 Report discusses a measure selection process as follows:

“Utilities should evaluate measures in the course of developing recommendations for subsequent year programs. This process should be open to input from other parties. Parties recommending changes in eligibility for a specific measure should offer information regarding the factors to be used in assessing eligibility. The utilities should then evaluate these measures using all available information on both cost effectiveness and impacts on hardship, and develop a set of recommendations. If warranted by the evidence, these recommendations may vary across climate zones.”²⁰

We are several steps away from developing a formal, structured indicator for this purpose. As discussed in this decision, the Working Group will be submitting a report regarding this issue on October 1, 2000. This will afford the Commission sufficient time to address the Working Group recommendations and any nonconsensus issues so that the utilities can incorporate new reporting requirements into their May 1, 2001 Annual Reports, i.e., in time for the PY 2002 planning cycle. Therefore, a consistent approach to evaluating changes to measure eligibility will not be considered and approved by the Commission in time for such changes to be implemented for PY 2001. Our options are (1) to allow some measure eligibility modifications for PY 2001 in the interim, based on specific showings during the “compliance” phase of this proceeding (i.e., this fall) or (2) defer consideration of changes to measure eligibility until the planning process for PY 2002, as SCE recommends.

²⁰ *Ibid.* p. 3-7.

As a practical matter, we find that there is simply insufficient time and resources to go beyond the Phase 1 Report and follow up this decision with a compliance phase that would consider new proposals for measure eligibility in PY 2001.²¹ By delaying the final approval of eligible measures for PY 2001, we would also create an unacceptable delay for utilities that are in the process of issuing a Request For Proposals to select new PY 2001 program implementors, such as PG&E.²² Moreover, by attempting this evaluation prior to our consideration of the Working Group report, we would be undermining (and prejudging) our efforts to standardize evaluation and reporting efforts for the LIEE program. As discussed in the Assigned Commissioner's Ruling dated April 28, 2000, we expect these issues to be resolved in time for utilities to incorporate new reporting requirements into their May 1, 2001 Annual Reports which initiates the PY 2002 planning process.

Accordingly, we concur with SCE's position and defer consideration of modifications to measure eligibility until the PY 2002 planning process.

Specific Program Recommendation 7

LIAB recommends that current efforts to standardize reporting, standards, policies and procedures involved in the delivery of CARE and LIEE programs continue. SCE argues that this recommendation is no longer necessary because the Commission already has initiated standardization efforts. LIAB now agrees

²¹ We point out that none of the participants in this proceeding (LIAB, the Standardization Project team and interested parties commenting on the LIAB recommendations and on the Phase 1 report) recommended measure eligibility changes for PY 2001.

²² See PG&E's Comments On Draft Decision, pp. 1-4.

with this assessment, but notes that standardization of the CARE program is not being addressed in this forum.

We note that there are efforts underway to standardize elements of the CARE program. As discussed above, we have directed a working group to standardize certain reporting requirements and utility administrative costs for our consideration, including those that relate to the CARE program. However, we acknowledge that the calculation of CARE penetration rates is not currently standardized across utilities, and this issue is not being addressed under the standardization project. We believe that outreach efforts for the CARE program should be evaluated using consistent calculations of penetration rates. We understand that the Working Group is in the process of developing an interim proposal on the methodology for this calculation, and the consensus that emerges from this process should be presented by the utilities in their compliance applications. (See Section 7 below.) Although a more durable methodology may be developed as part of the Needs Assessment Study, we note that the results of these efforts may not be available for use in program planning for several years. We intend to utilize a standardized approach to calculating penetration rates for the CARE program overall, as well as in our evaluation of the CARE Outreach Pilot.

In particular, for the Outreach Pilot, we intend to evaluate additional CARE enrollment on a consultant-by-consultant basis to assess the ability of new outreach approaches to improve CARE penetration. In conducting this evaluation, we intend to take into account other factors that could be increasing enrollment (e.g., end of the rate freeze and rate increases). To this end, it makes sense to also consider the utility's added enrollment over the same period.

Specific Program Recommendations 8, 9, 10 and 11

In recommendations 8-11, LIAB makes proposals related to assessing, auditing, and evaluating LIEE and CARE program performance. First, LIAB recommends that the Energy Division be required to “monitor and audit the utilities’ compliance with Commission directives and perform an evaluation of outreach efforts,” encompassing the following:

- ◆ LIEE implementers’ internal inspections to ensure that the correct measures have been properly installed.
- ◆ Energy Division’s audits and polls to monitor and improve the utilities’ performance.
- ◆ A Periodic Independent Audit would provide a periodic assessment of the entire LIEE and CARE delivery system, including the role of the LIAB. An independent contractor authorized by the Commission would perform the Periodic Independent Audit.

Second, LIAB recommends that the Commission initiate an independent audit, performed by a contractor authorized by the Commission, “to assess the entire LIEE and CARE delivery systems.” With respect to LIEE, LIAB recommends that this assessment include “measurement of performance relative to the standards established for installation and measure selection criteria.”

Third, LIAB recommends that the cost and energy impacts associated with appliance repair or replacement and home rehabilitation be excluded from cost-effectiveness evaluations of the energy efficiency programs.

Fourth, LIAB recommends that the Commission require an Independent Audit and Evaluation Service to audit and evaluate the CARE and LIEE programs after standardization has been achieved to achieve the following principal objectives:

- ◆ Assess progress in meeting targeted needs of the eligible low-income population;

- ◆ Assess success in achieving participation objectives in total and within segments of the eligible low-income population;
- ◆ Support the performance incentives system;
- ◆ Motivate innovative planning and implementation activities that improve on-going programs or that create new programs and services, and
- ◆ Insure fulfillment of all roles and responsibilities of the utilities in a comprehensive manner including overall management and performance of services.

More specifically, LIAB recommends that the Independent Audit and Evaluation Service be required to implement a system that, among other things:

- 1) includes audit and evaluation protocols to measure energy and cost impacts for the current LIEE program;
- 2) expands those protocols to include at least the CARE program and safety, comfort, hardship and other similar considerations;
- 3) includes process and impact evaluations for both the CARE and LIEE programs;
- 4) includes the collection of data necessary to evaluate program performance, especially those data needed to quantify performance incentive payments to the utilities; and
- 5) includes the evaluation of energy education and consumer protection activities.

The Independent Audit and Evaluation Service would be an entity separate from the utilities and the Commission and would report to the Commission and the LIAB.

SCE and SDG&E/SoCal object to these recommendations. With regard to LIAB's proposed audit of the utilities' internal inspections, SCE contends that the utilities have extensive inspection procedures in place and, moreover, that the Commission is evaluating those procedures to improve standardization across utilities. In SCE's opinion, the programs have sufficient oversight to protect program participants and ratepayers without placing additional requirements on the Energy Division. SCE and SDG&E/SoCal point to the work already

underway under by the Working Group and other Commission initiatives to improve program monitoring, evaluation and performance. In their view, LIAB's proposals are premature or duplicative of these efforts.

For the longer term, SCE suggests that the Commission consider mandating that the utilities undertake periodic process evaluations of the CARE and LIEE programs. Such evaluations are regularly undertaken by the utilities for energy efficiency programs, using independent consultants. After the Commission has provided its policy responses to the Needs Assessment Study, SCE believes that it would be logical to ask the utilities to contract with a consultant to conduct such process evaluations and to develop recommendations for changes consistent with the Commission's newly stated policies.

As SCE and SDG&E/SoCal point out, there are several efforts currently underway to assess and improve program performance for low-income assistance programs. With respect to the performance of LIEE installation contractors, LIAB acknowledged in its July 9, 2000 comments that we will be addressing inspection policies in Phase 2 of the Standardization Project. Phase 2 recommendations on inspection procedures will be available for comment and Commission consideration during the PY 2002 program planning cycle, if not sooner. In addition, the utilities have been directed to propose improvements to their current procedures for monitoring and reporting contractor performance in their PY 2002 applications for low-income assistance programs. (D.00-07-020, mimeo., pp. 87, 114.)

As discussed under Recommendation 4, the issue of how to consider and calculate program cost-effectiveness is currently under review by the Working Group. Adopting LIAB's recommendation on what to exclude from cost-effectiveness evaluations at this time would prejudice the outcome of that process.

As we have already noted, the Commission has directed the Energy Division to conduct a Needs Assessment Study so that the low-income assistance programs (CARE and LIEE) can be more effectively designed to meet the needs of low-income customers. Without completing such an assessment, we agree with SCE that an independent audit at this time will not provide useful information for future program direction.

In sum, LIAB's recommendations for improving program evaluation, information and oversight do not acknowledge current and developing reporting requirements for the utilities, the work of existing measurement and evaluation groups in this and other Commission proceedings, or the Standardization Project and Needs Assessment Study currently underway. Moreover, the specific independent auditing requirements proposed by LIAB need to be weighed against their cost in resources and manpower and compared with other approaches for improving program monitoring, such as the process evaluations described by SCE. We have no such information in the filings before us.

In order to obtain additional information, we direct the utilities to describe current procedures (audits, process evaluations, polls, etc.) undertaken to monitor program quality, cost efficiency and customer satisfaction for their low-income assistance programs. The utilities should present recommendations for improving these procedures or instituting alternative ones, along with the associated costs and manpower requirements. This information should be presented in the utility applications for PY 2001 low-income assistance programs.

Specific Program Recommendations 12, 13, 14 and 15

LIAB recommendations 12-15 contain proposals concerning the prescribed list of energy efficiency measures for LIEE programs and other issues that have been addressed in Phase 1 of the Standardization Project to LIAB's satisfaction,

or will be addressed in Phase 2. In addition, LIAB recommends that utility proposals for standardization first be submit to LIAB for review and then to the Commission for approval.

We agree with SCE that recommendations 12-15 are either made moot at this time, or would prejudice Phase 2 efforts. We also see no reason to modify the process already underway for Phase 2, as established by the May 24, 2000 Assigned Commissioner's ruling.

Specific Program Recommendation 16

LIAB recommends that the Commission require all utilities to install attic ventilation as a stand-alone measure in areas with high cooling loads when the home has sufficient insulation but inadequate attic ventilation.

SCE and SDG&E/SoCal contend that it is premature to adopt this recommendation until the Attic Ventilation Pilots administered by PG&E and SDG&E are evaluated. Under these pilots, PG&E and SDG&E were directed to install attic ventilation for PY 2000 on a stand-alone basis, i.e., not in conjunction with attic insulation. They are required to track the costs, energy savings, number of call backs and complaints, and other items.²³

LIAB's recommendation is premature. As anticipated in Res. E-3586, prior to mandating the program on a permanent basis, we will evaluate the cost-effectiveness of attic ventilation as a stand-alone measure based on the pilot results. PG&E and SDG&E are directed to include the pilot results in their compliance applications. (See Section 7.)

²³ Res. E-3536, dated January 20, 1999, p. 27, Ordering Paragraph 1.

Specific Program Recommendation 17

LIAB proposes that the utilities, with comments and recommendations from the LIAB, develop non-discriminatory and equitable strategies to select those who will receive LIEE benefits from among qualified low-income customers. LIAB proposes to review these strategies and make recommendations to the Commission for approval. LIAB recommends that the utilities apply those strategies no later than January 1, 2002.

SCE and SDG&E/SoCal argue that it is premature to adopt this recommendation. In their view, the Needs Assessment Study will offer useful information on the future direction and adequacy of program services. SCE contends that, until this study is completed, there is no evidence to suggest LIEE programs are inadequate for the existing need. SDG&E/SoCal suggest that LIEE's proposal violates equity principles of the program.

In its June 9, 2000 filing, LIAB acknowledges that "information gleaned in the needs assessment may be of use in reaching this goal." We agree, and believe that upon completion of the Needs Assessment Study, parties can work collaboratively to determine whether any equity issues exist and how they should be addressed.

Specific Program Recommendation 18

LIAB recommends that the utilities be required to analyze and assess methods to constructively enhance and integrate LIEE, CARE and other local, state and federal weatherization programs operating in California. The LIAB recommends that, wherever possible, the utilities should seek to coordinate the outreach and intake processes for CARE and LIEE and other programs that serve low-income customers.

In D.00-07-020, we directed the utilities to report on the access of low-income customers to programs provided by community service providers. We

also directed all utilities to follow PG&E's lead in satisfying certain prerequisites that would enable CSD to secure more Federal leveraging funding.²⁴ In its June 9, 2000 filing, LIAB states that there is general agreement on this recommendation and that the utilities are moving in this direction. We don't believe that any further direction from the Commission is needed at this time to encourage the utilities to improve their referral and leveraging efforts. An initial report on these efforts is due on October 1, 2000 with an update report due by April 1, 2001 in this proceeding. We will take additional action on this issue, as needed, after obtaining comments on the reports.²⁵

Specific Program Recommendation 19

LIAB recommends that utilities be "required to install all feasible measures from the prescribed set of measures in an eligible customer's home, if there are program funds available to serve that home." In addition, LIAB recommends that the utilities "coordinate their efforts with state and federal programs to ensure that all feasible measures are installed."

SCE argues that these recommendations are unnecessary because 1) Assembly Bill 1393 already mandates the installation of all feasible and approved measures and 2) the coordination aspect of this recommendation is addressed in LIAB's Recommendation 18.

We find that the first part of LIAB's recommendation is made superfluous by the longstanding Legislative policy to "provide as many of these measures as

²⁴ Ibid. p. 84.

²⁵ Ibid. Ordering Paragraph 10.

feasible for each eligible low-income dwelling unit.”²⁶ In its June 9, 2000 filing, LIAB states that the Commission has not articulated the manner in which it intends to accomplish this goal for PY 2001 and beyond. We disagree. Measure feasibility is dependent both on the measure selection criteria and other aspects of feasibility, such as specific conditions in the home that make installation infeasible. These issues have been addressed in prior program planning cycles and are presented on a standardized basis in the Phase 1 Standardization Report.

In addition, as SDG&E/SoCal points out, further discussions on cost-effectiveness tests and reporting requirements for low-income programs are underway in the Working Group. As discussed above, the Working Group report will be submitted and subject to comment in time for consideration during the PY 2002 planning cycle. LIAB’s views have also been made known during the review process and LIAB has the opportunity to further comment on the report. (See Section 6.)

With regard to the coordination aspect of Recommendation 19, we believe that this issue has been addressed by the directives of D.00-07-020. As discussed above, the utilities have been directed to improve and report on their procedures for coordinating with community service providers and leveraging funds.

In sum, we find that Recommendation 19 does not add to or modify current Commission policies or implementation requirements for low-income assistance programs.

²⁶ Public Utilities Code Section 2790(b)(2). We note that this section was not amended by Assembly Bill 1393.

Specific Program Recommendation 20

LIAB recommends that the Commission require the utilities and service delivery implementers to inform property owners (including landlords) and tenants about existing conditions that prevent LIEE measures (including LIEE-funded home shell and furnace repairs) from being installed.

SCE observes that this recommendation may add costs to the program. SCE believes some service delivery providers, particularly administrative and educational service providers, may perform functions that do not require expertise on whether adverse building conditions exist. Also, SCE argues that it is often difficult to inform landlords about existing conditions because they are not on-site. SCE believes that ongoing efforts to standardize the Policies and Procedures Manual may provide additional information on whether this recommendation is desirable. Until then, SCE does not recommend its adoption. SDG&E/SoCal echos these concerns.

We find merit to the concerns voiced by SCE and SDG&E/SoCal. We note that LIAB did not respond to them in its June 12, 2000 reply comments. The utilities and interested parties should address this issue during the ongoing phases of the Standardization Project in time for Commission consideration for the PY 2002 planning cycle.²⁷

²⁷ By letter dated August 25, 2000, the Standardization Project team set forth the Phase 2 and Phase 3 schedule for this ongoing effort. The Phase 2 report is expected to be filed on September 1, 2000 and the Phase 3 report is expected to be filed on April 1, 2001. This schedule permits the Commission the opportunity to review joint recommendations (and any nonconsensus positions) in time for incorporation into the PY 2002 planning cycle.

Specific Program Recommendation 21

LIAB recommends that all measures included in the LIEE program be available at no direct up-front cost to the low-income participant where the home and/or equipment is owned by the participant.

SCE argues that this is a case where standardization for its own sake is not in the interest of customers and ratepayers. SCE agrees co-payments may not be appropriate for most measures. Applied narrowly, however, SCE believes co-payments have proven to be beneficial. SCE explains that it has been installing evaporative coolers for over 10 years. To continue operating properly, evaporative coolers require significant maintenance. SCE's experience suggests customers are willing to contribute the co-payment, thus extending program resources to more customers. Moreover, SCE believes the co-payment creates a sense of ownership for the customer, thus increasing the likelihood that the necessary maintenance will be performed to keep the evaporative cooler operating properly. SCE recommends that the Commission not adopt this recommendation, as it would limit the Commission's future latitude to approve co-payments for specified measures. SDG&E/SoCal state that this issue is being addressed in the Standardization Project.

LIAB did not respond to SCE's concerns in its June 12, 2000 response, other than acknowledging that there were "legitimate differences of opinion" on this issue.²⁸ Based on SDG&E/SoCal's comments, it also appears that standardization on the issue of co-payments will be addressed during subsequent phases of the Standardization Project. We believe there needs to be

²⁸ See LIAB's Reply Comments, p. 2.

further discussion and consideration of opinions on this issue, and will not adopt LIAB's recommendation for PY 2001.

Specific Program Recommendation 22

The LIAB recommends that the Commission adopt several guiding principles regarding the utilities' implementation of the LIEE and CARE programs, including:

- ◆ No customer shall be forced to take LIEE or CARE services;
- ◆ A customer offered a set of LIEE measures is free to reject any one or more of them. The set of LIEE measures is not intended to be an "all or nothing" proposition for eligible customers;
- ◆ A customer will not be required to participate in the CARE program as a condition of being in the LIEE program;
- ◆ A customer will not be required to participate in the LIEE program as a condition of being in the CARE program;
- ◆ When such discretion is allowed, a customer, an LIEE implementer, or the utility will not be required to report any safety/fire/code violations to authorities.

LIAB further recommends that utilities develop and propose a customer bill of rights for the CARE and LIEE programs, in cooperation with LIAB and its Technical Committee, that includes these guiding principles. LIAB proposes that the customer bill of rights also describe the consumer complaint process and explain how a customer could initiate that process.

In its comments, SDG&E/SoCal raises the concern that allowing customers to reject cost-effective measures or those with the greatest savings potential may be contrary to the Commission's goal to provide customers with benefits as well as make the programs more cost-effective.

As SCE notes, most of LIAB's recommendations reflect existing practice and policies adopted by the Commission and implemented by the utilities, albeit

not in a standardized format. We do find merit to the concept of developing specific policies and procedures related to the customers' "rights" in a standardized fashion. However, we share SDG&E/SoCal's concerns regarding the customers' discretion to pick and choose among any measures offered. There may be other principles that should be added to the list presented by LIAB. We believe that a standardized customer "bill of rights," including a description of the consumer complaint process, should be developed for both the CARE and LIEE programs. The utilities should describe (1) the current methods by which consumers or contractors can register complaints (e.g., by calling an 800 number) and (2) procedures by which utilities respond and resolve them. We expect the utilities to then address ways in which these approaches might be standardized across utilities. We anticipate that the specifics of this document may take some time to develop and may require coordination with Phase 2 of the Standardization Project on the LIEE side. The utilities should jointly develop such a proposal with public input, and present it for our consideration in their PY 2002 program applications, or sooner if possible.

Specific Program Recommendation 23

LIAB recommends that the Commission, for low-income programs starting in 2001, require "a uniform application form (or at least a similar application form for all of the utilities which reveals and requests the same data) and a system of self-certification of participants for the CARE program, and a system of regular post-enrollment monitoring, including uniform random sampling verification procedures and targeted verification."

SCE believes that uniform application forms would require the utilities to reprogram their data systems at unknown cost to facilitate data entry. Thus,

while the utilities should strive to collect the same types of customer data, SCE argues that identical data collection forms are unnecessary and burdensome.

In SDG&E/SoCal's view, LIAB's recommendation for CARE self-certification and post-enrollment monitoring is moot because this was implemented in October, 1999. In addition, SDG&E/SoCal requests clarification of the term "targeted verification." SDG&E/SoCal believes that this term implies discriminatory monitoring of customer eligibility.

We find merit to the concerns raised by SCE and SDG&E/SoCal, and note that LIAB did not respond to them in its reply comments. However, there does seem to be general agreement on the need to work toward the development of a form that requests the same types and categories of data from all customers enrolling in CARE. This process will take some time, and we do not see the urgency in requiring a concentrated effort prior to the filing of PY 2001 applications. Therefore, we direct the utilities to jointly develop such forms with public input and present them in a jointly filed Advice Letter by March 1, 2001. This will enable the Commission to authorize the new forms in time for the June 1 implementation of new income levels that are developed each year.

Specific Program Recommendation 24

LIAB recommends that the utilities continue to implement the CARE programs serving sub-metered customers, group homes and agricultural housing as they are currently being implemented. LIAB recommends that the utilities study and make recommendations to improve these programs in collaboration with the Technical Committee and the LIAB.

SCE believes that the Commission does not need to adopt this recommendation to ensure SCE continues to perform its responsibilities and to work cooperatively with LIAB. Moreover, SDG&E/SoCal believe that this

program should be studied as part of the Needs Assessment Study, rather than in the manner proposed by LIAB.

Ongoing implementation and assessment of this program appear to be underway and the Needs Assessment Study will shed more light on the need for program improvements. LIAB has not indicated how this represents a change in current program policies or program design, or why this is a high priority policy recommendation for PY 2001. We do not see the need for further Commission direction or policy modification regarding this program at this time.

Specific Program Recommendation 25

In order to reach the goal of increased participation in the CARE program, LIAB recommends that all potential agents (e.g. CBOs, Community Action Agencies, non-profits, municipal utilities, independent contractors, etc.) should have the opportunity to compete for contracts as implementers of outreach and intake services.

SDG&E/SoCal argues that this recommendation is premature and should await the outcome of the CARE Outreach Pilot. SCE states that it is enthusiastic about the statewide CARE Outreach Pilot and its potential for identifying new outreach practices that will enhance future outreach efforts and create new opportunities for partnerships. Nevertheless, SCE believes that, as a program administrator for CARE, it should have management discretion and latitude in determining the best way to engage in partnerships to promote CARE outreach within SCE's service territory. Therefore, SCE does not support this specific recommendation.

In its June 9, 2000 comments, LIAB states that there "is movement towards this goal" and recommends that "the Commission encourage this movement in any way possible."

We note that this specific program recommendation was also contained in LIAB's outreach recommendations, discussed above. We have encouraged the utilities to explore alternative approaches to outreach via the Outreach Pilot. Adopting LIAB's recommendation at this juncture, before the results of that pilot are available and evaluated, would be premature.

Specific Program Recommendation 26

LIAB proposes that it explore with the Commission the possibility of greater cross-program coordination of regulated low-income programs.

As SCE and SDG&E/SoCal note, this is not a program recommendation per say, but rather a statement of "intent to explore" that is quite vague. This recommendation does not present a clear program or policy modification and will not be considered without further refinement.

Specific Program Recommendation 27

LIAB recommends that all utilities implement in-home and other educational programs in coordination with other organizations. In particular, LIAB recommends that in-home efforts should occur as part of other aspects of the LIEE service delivery and that educational programs should also be offered in conjunction with other efforts such as those of the Commission's Consumer Services Division, the Electric Education Trust and community events at conveniently accessible locations.

SCE does not support this recommendation at this time. SCE believes it is uncertain whether there is sufficient long-term strategic benefit to efforts directed at coordinating activities with the Electric Education Trust.²⁹ SCE believes

²⁹ The Electric Education Trust was created by D.97-03-069 for the purposing of helping customers understand changes to the electric industry, with particular focus on

Footnote continued on next page

energy education is a component of the LIEE program, and that current efforts by interested stakeholders will lead to improved coordination of program services.

SDG&E/SoCal notes that it currently provides in-home energy education and energy education workshops at low-income service agencies through their LIEE program, and is unclear as to how LIAB wishes to modify services.

We are unclear what specific program modifications are implied by LIAB's recommendation, and note that LIAB does not respond to the issues raised in the comments. We will not adopt this recommendation.

Specific Program Recommendation 28

LIAB recommends that LIEE measures be offered to low-income utility customers who either heat or air condition their home with a utility commodity. LIAB contends that the utilities currently restrict the installation of LIEE measures to customers who use the utilities' energy as a source of heat. In LIAB's view, this practice does not take the customer's comfort or hardships into consideration and therefore, ignores an important purpose of this legislatively mandated program.

SCE believes this blanket recommendation should not be adopted as it could result in ratepayers subsidizing the weatherization of homes that use non-utility energy sources. In SCE's view, the implications of this policy need careful consideration. SCE argues that there is no justification for SCE's ratepayers

consumer groups and communities where direct access participation remained low or where the level of reported consumer abuses was high. In D.97-08-064, the Commission directed that the Trust would plan and manage a CBO-based education and outreach program. This program is currently mandated by legislation to continue until December 31, 2001.

paying for the installation of showerheads in homes that do not use utility fuel for water heating. Moreover, SCE contends that LIAB's understanding of current utility practices is in error, because SCE does provide evaporative coolers and refrigerators to customers regardless of their heating source.

SDG&E/SoCal views this recommendation as changing qualification guidelines, and suggest it be considered as part of the efforts to coordinate regulated low-income programs, as suggested in Recommendation 26.

We have not had an opportunity to examine this issue in the context of how to standardize utility LIEE procedures and coordinate most effectively with other low-income energy efficiency programs. Apparently the state and federal programs provide funding for weatherization measures irrespective of the heating source, whereas the utilities either do not, or have applied a somewhat inconsistent approach in the past. The issue of whether ratepayer-funded programs should use the broader state and federal qualification guidelines was raised in the PY 2001 program planning cycle. (A.99-07-002.) In that proceeding, Contractors Coalition proposed that certain policies and procedures for the utility programs be standardized along the lines of CSD's current practices. We made our expectations clear that this issue, as well as other differences in policy and procedures, would be addressed in subsequent phases of the Standardization Project for consideration during the PY 2002 planning cycle, or sooner if possible.³⁰

We reiterate this expectation. This issue should be addressed during Phase 2 of the Standardization Project and the utilities should present their recommendations in the PY 2002 program applications, or sooner. If the utilities

³⁰ D.00-07-020, mimeo., pp. 85-87.

are in opposition to broadening the qualification guidelines, they should describe in detail how they plan to coordinate with other programs so that the low-income customer does receive as many of the weatherization measures “as are feasible for each eligible low-income dwelling unit,” as directed by Public Utilities Code Section 2790(b)(2).

5. LIEE Standardization Project Report (Phase 1)

The LIEE Standardization Project Report (Phase 1) presents recommendations for a common set of installation standards to be used in all four utility programs. It also presents recommendations for a common set of selection criteria to be used to select measures for inclusion in utility programs. In addition, the report presents recommendations for achieving consistency in the utilities’ policies and procedures relating to specific program measures, i.e., nonfeasibility criteria for the Big Six and other weatherization measures, and other policies and procedures related to specific measures. Finally, the report identifies the major areas of differences in general policies and procedures among the utilities that will be addressed in Phase 2.

In the course of developing the recommendations contained in the report, the project team took the following steps:³¹

- ◆ In early February, 2000, the project consultants met with the utilities to clarify policies and procedures and installation standards, and to request additional materials relating to the programs.
- ◆ On February 22, the project consultants met with LIAB’s Technical Committee to discuss the objectives of the project and to solicit input.

³¹ The project team consisted of the utilities and the project consultants: Regional Economic Research, Inc. (RER) and Richard Heath & Associates (RHA). Energy Division assisted in coordinating the effort.

- ◆ On March 3, the project consultants met with staff from the Energy Division and the Division of Ratepayer Advocates to discuss project objectives and to establish administrative procedures.
- ◆ On March 24, the project team distributed an initial summary of differences in eligible measures, eligible minor home repairs, and installation standards to a list of interested parties including the members LIAB, its Technical Committee and other parties that had attended the February 22 meeting.
- ◆ On March 28, the project consultants attended a joint meeting of LIAB and its Technical Committee to discuss the summaries of differences. On March 29, the Technical Committee (including the utilities) further considered these summaries and developed a set of comments and suggestions that was forwarded to the project team.
- ◆ On April 7 and April 10, the project consultants met with the utilities, CSD and Commission staff to develop recommendations relating to both installation standards and a limited set of policies and procedures.
- ◆ The project team attended two additional LIAB Technical Committee meetings to solicit public input. These meetings were held on April 18-19 in Downey and April 25-26 in San Francisco.
- ◆ The project team presented its draft final report to the LIAB in San Francisco on May 2, 2000.

LIAB supports the recommendations in the report, with two qualifications. First, LIAB requests that the Commission clarify that inclusion or absence of measures in the statewide weatherization installation manual does not restrict the Commission, in the future, from implementing new measures or deleting measures contained that manual. We note that the utilities concur with this request on page 3-7 of the Phase 1 Standardization Project Report. In our discussion of LIAB's Specific Program Recommendation 6, we also state our concurrence.

Second, LIAB requests that the Commission direct utilities to carefully consider comfort, reduction of hardship and safety when deciding measure

eligibility. Again, this request appears consistent with the utilities' plans to explicitly consider these factors when considering measure eligibility, as discussed on page 3-6 of the report. We also note that the Working Group will be considering some of the implementation aspects of this issue for our consideration.

In sum, it appears that there is general consensus in support of the recommendations presented in the Phase 1 Standardization Project Report. We have carefully reviewed the Phase 1 recommendations and find them to be reasonable. By creating a standardized weatherization installation standards (WIS) manual, we believe that the recommendations contained in Phase 1 Standardization Report will improve the implementation of LIEE programs. The Phase 1 recommendations on cost-effectiveness should be accepted for further consideration by the Working Group.

In its comments on the draft decision, SCE refers to CALMAC participation in designing cost-effectiveness tests for the LIEE program. (See SCE Comments on Draft Decision, pp. 2-3.) As we stated in D.00-05-019, CALMAC is not an official Commission-sponsored advisory body. (D.00-05-019, mimeo., pp. 22-23.) We clarify our expectation that the Reporting Requirements Manual Working Group will develop recommendations in response to the April 28, 2000 Assigned Commissioner's ruling. While the Working Group is free to solicit input from CALMAC, it is the Working Group (and not CALMAC) that is responsible for evaluating program cost-effectiveness and for presenting recommendations on unresolved issues to the Commission for resolution.

Within 30 days of the effective date of this decision, the utilities should jointly file the new WIS manual in this proceeding which incorporates the follow-up recommendations submitted on July 5, 2000. The utilities should serve a notice of its availability to all appearances and the state service list in this

proceeding. This new manual should be used by the utilities in designing their PY 2001 programs, and will be the standard used for all installations in the utility programs beginning January 1, 2001.

It is evident from the comprehensiveness and clarity of the report that members of the project team conducted a thoughtful and well-organized effort during this phase of the project. We commend their efforts. We also wish to commend our Energy Division coordinator, Donna Wagoner, for her time and commitment to keeping the project on track and responsive to our needs. We look forward to a Phase 2 report of equal caliber and comprehensiveness.

6. Further Direction For LIAB

In D.00-02-045, we directed LIAB to “scrutinize and scale back or disengage from any activities that are inconsistent with the role and authority of the Board,” indicating that this should make it possible for the Board to meet less often.³² In order to maximize program resources, we believe that LIAB should be task-based. Moreover, we need to be realistic concerning the availability of Commission resources to assist the Board and advisory committee. Accordingly, we clarify below what activities are (and are not) assigned to LIAB or its advisory committee in the near term, for which Energy Division will continue to provide assistance. If LIAB desires to meet more frequently and perform additional activities with the assistance of Commission resources, it must seek and receive approval from the Energy Division. If approval is not given, LIAB will need to rely on non-Commission resources to complete any additional tasks or conduct additional meetings. Such additional tasks or meetings that LIAB undertakes must be directly related to the utility low-income assistance

³² D.00-02-045, mimeo., p. 27.

programs under the Commission's jurisdiction, for which LIAB has been formed to serve as an Advisory Board.

Pursuant to the April 28, 2000 Assigned Commissioner's Ruling, LIAB has been encouraged to participate in Reporting Requirements Manual and Standardization of Administrative Costs Working Group meetings or workshops to make its views known during the workshop process. On July 12, 2000, the Energy Division provided to the Working Group participants, a copy of LIAB's June 1, 1999 Proposal for Utility Standardized Reporting Guidelines. In addition, if it has not already done so, the Energy Division should provide to the Working Group a copy of LIAB's June 30, 1999 comments on the May 17, 1999 joint utility proposal for standardizing administrative costs for low-income assistance programs. The Energy Division should also keep the LIAB members apprised of when the Working Group report is submitted, and LIAB may comment on that report within 20 days thereafter, as directed in the April 28, 2000 Assigned Commissioner's Ruling. In this way, the Commission will be made aware of LIAB's views on the issues being addressed by the Working Group.

The Energy Division is currently developing a Needs Assessment Study work plan. The LIAB submitted its proposal for a needs assessment proposal in 1999. As this study progresses, the Assigned Commissioner may request further input from LIAB, as appropriate. However, at this time we give LIAB no further assignments on this issue.

As discussed above, LIAB submitted its PY 2001 low-income assistance program recommendations and clarified which LIAB recommendations represented differences between the utilities and the Board. We do not anticipate the need for further input from LIAB on PY 2001 programs.

On September 1 of each year, LIAB submits Board nominations and its operating budget for the coming year.³³ To conserve program resources, we believe that this task should be transferred to the Energy Division. Accordingly, by September 1 of each year, the Energy Division should solicit and submit nominations for Board membership and prepare and submit the Board's budget for the upcoming year. The Energy Division should file its recommendations in the form of a report and serve all appearances and the state service list in this proceeding (or successor proceeding). Interested parties and the LIAB may file comments within 20 days thereafter.

Pursuant to D.00-07-020, as part of the PY 2002 planning process, the utilities are to solicit input from interested parties and the LIAB when they develop standardized methods for producing data on bill savings and expenditures for LIEE expenditures on an overall program and per unit basis, by utility. LIAB should schedule a meeting no later than January 2001 to provide input to the utilities on the utilities proposal before the utilities submit their proposal on February 1. As of the date of this decision, the schedule for the PY 2002 planning process has not been fully developed. When the Commission or Assigned Commissioner order the schedule for the PY 2002 planning process, further tasks for LIAB for the PY 2002 planning process may be established.

Pursuant to D.00-02-045, LIAB is not required to maintain an advisory committee. We encouraged LIAB to convene working groups in addition to or in lieu of maintaining an advisory committee.³⁴ Because the LIAB has substantially completed its assigned tasks for the PY 2001 planning process, the LIAB should

³³ *Ibid.*, p. 43

³⁴ *Ibid.*, p. 26

direct its advisory committee to disengage from any work other than to advise the Board on 1) the proposal of the Working Group to standardize the reporting requirements and administrative costs of the low-income assistance programs and on 2) how to standardize methods for producing data on bill savings and expenditures for LIEE programs, as directed in D.00-07-020.

We remind LIAB, as ordered in D.00-02-045, that it should retain its independent advisory role and not simply ratify the recommendations of its advisory committee. After the advisory committee provides LIAB with its recommendations on the two areas described above, LIAB should consider disbanding its advisory committee and convene workshops or working groups when it receives additional assignments from the Commission.

As of this date, the only specific tasks we have assigned LIAB with the assistance from Energy Division are the two described above. Accordingly, LIAB should be able to substantially reduce the number of scheduled meetings for both itself and its advisory committee. Based on current assignments, LIAB and its advisory committee should reduce their scheduled meetings to those occurring in October, 2000 and January, 2001. Unless approved by the Energy Division, any additional tasks or meetings undertaken by LIAB will need to be supported by non-Commission resources. As discussed above, such additional tasks or meetings that LIAB undertakes must be directly related to the utility low-income assistance programs under our jurisdiction. LIAB is directed to prepare and submit to the Energy Division written minutes of any additional meetings and written reports on any additional activities that are undertaken without the assistance of the Energy Division.

We also need to clarify our expectations regarding the appropriate role of LIAB as an advisory committee. First, with regard to other advisory committees or working groups formed by the Commission to address low-income assistance

issues, we believe that LIAB can best fulfill its independent advisory role if its Board members do *not* also sit on those other committees or working groups. As we discussed in D.00-02-045, as an advisory body to the Commission, LIAB may not be an applicant, protestant, respondent, petitioner, complainant, defendant, or make formal appearances in Commission proceedings.

This brings us to the issue of LIAB's participation in a recently-formed group, the California Measurement Advisory Council (CALMAC). In A.99-05-002, et al., the utilities, ORA and the California Energy Commission submitted Joint Recommendations that a CALMAC be formed. The Joint Recommendations proposed that a member of the LIAB be appointed as a non-voting member of the CALMAC.

In D.00-05-019, we considered the Joint Recommendations, among other earnings verification issues. We concluded that the Joint Recommendations were "a reasonable concept" to address market assessment and evaluation issues, but did not recognize CALMAC as an official Commission-sponsored advisory body. We indicated that CALMAC may participate in Commission proceedings and through that participation, it may achieve party status.³⁵ However, our decision did not address the specific recommendation regarding LIAB participation.³⁶ Because CALMAC will become a party if it participates in Commission proceedings, we clarify today that LIAB members may not sit on the CALMAC, even as a non-voting member. This restriction applies to the same individual's participation, not that organization's participation. However, this does not preclude the Commission or Assigned Commissioner from soliciting LIAB's

³⁵ *Ibid.*, pp. 22-23.

³⁶ See D.00-05-019, mimeo., Conclusion of Law 6.

views on CALMAC reports or other testimony submitted in future Annual Earnings Assessment Proceedings.

7. Compliance Applications

In D.00-07-020, dated July 6, 2000, we approved the utilities' proposed PY 2000 LIEE program plans and budgets and authorized the utilities to continue to operate those programs through December 31, 2001, "*unless and until subsequent program and budget changes are approved by the Commission.*" (Ordering Paragraph 12, emphasis added.) We identified certain issues related to utility outsourcing that should be further explored during the PY 2002 planning cycle, but did not direct any new activities or implementation changes for PY 2001. The purpose of LIAB's filing and interested parties' comments in this proceeding was to identify any high priority policy and program design modifications that utilities should make to their LIEE programs during PY 2001. As discussed above, we have concluded that none are warranted.

Moreover, as SDG&E/SoCal point out, no program design or changes to measure eligibility have been recommended to the Commission as part of the Standardization Project (Phase 1) or in comments on that report:³⁷

"...the Standardization Team's approved Phase 1 recommendations are not 'program and budget changes' as envisioned by D.00-07-020. In fact, these recommendations do not include any LIEE or CARE program design changes at all, but merely clarify 'how' and 'when' certain measures should be installed for statewide consistency. Moreover, these changes

³⁷ We note that SDG&E filed Advice Letter 1239-E/1207-G on July 21, 2000 requesting modifications to measure eligibility for PY 2000 and PY 2001 on an emergency basis. We will address this request by Resolution, taking into account the policy considerations discussed herein.

are transparent to participating customers. No measures were added or deleted in the Phase 1 recommendations. Therefore, the Joint Utilities [SDG&E/SoCal] see no merit in submitting full-scale applications on the PY 2001 program plans and budgets.” (SDG&E/SoCal Comments On Draft Decision, p. 4.)

Therefore, we conclude that further review of the utilities’ PY 2001 program plans and budgets is not warranted. Nonetheless, we do require that the utilities file the following information for our review and consideration:

- ◆ A standardized method for calculating CARE penetration rates, presented jointly by the utilities and reflecting any consensus reached by the Working Group.
- ◆ A description of current utility procedures (audits, process evaluations, polls, etc.) for monitoring program quality, cost-efficiency and customer satisfaction and recommendations for improving these procedures or instituting alternative ones, along with the associated costs and manpower requirements.
- ◆ Recommendations regarding stand-alone attic ventilation based on the results of the Attic Ventilation Pilot, and
- ◆ A description of how the utilities will be tracking the results of the Outreach Pilot so that those results can be evaluated during the PY2002 program planning cycle.

In sum, the next step is for the utilities to file compliance applications containing the information requested above within 60 days from the effective date of this decision.³⁸ We have already authorized the continuation of the utilities’ PY 2000 programs and funding through December 31, 2001, and,

³⁸ In their comments to the draft decision, the utilities argue that an advice letter filing is preferable. We believe that the application process is appropriate for reviewing the type of information and recommendations requested by today’s decision. Should the utilities believe that these issues can be addressed without hearings, nothing precludes them from requesting ex parte treatment.

therefore, no further action is necessary to extend the current programs through 2001. Nor is there any need to discuss further our expectations for PY 2001 installation procedures, which have been addressed in the Phase 1 Standardization Report. As discussed in Section 5, the new WIS manual will be used by the utilities in designing and implementing their PY 2001 programs. As discussed under Specific Recommendation 6, we will not authorize modifications to measure eligibility for PY 2001, but will consider proposals for PY 2002 after the Working Group report has been commented on by interested parties and reviewed by the Commission.

8. Comments on Draft Decision

The draft decision of Commissioner Neeper and ALJ Gottstein in this matter was mailed to the parties in accordance with Public Utilities Code Section 311(g) and Rule 77.7 of the Rules of Practice and Procedure. Comments were filed on August 24, 2000 by the Bay Area Poverty Resource Council, the California/Nevada Community Action Association, Community Resource Project, Inc., Latino Issues Forum/Greenlining Institute, ORA, PG&E, SCE, SDG&E/SoCal, Residential Service Companies' United Effort (RESCUE)/SESCO Inc. and Insulation Contractors Association. Reply comments were filed on August 29, 2000 by SCE, SDG&E/SoCal, and PG&E.

We have carefully considered the comments on the issues addressed in today's decision. In response to those comments, we clarify the content and scope of the compliance applications to be submitted by the utilities in response to this decision. In particular, we explain that today's decision adopts the Standardization Project (Phase 1) recommendations and extends the PY 2001 programs and funding levels through December 31, 2001, without further program design modifications. Any future proposals for modifying measure

eligibility will be considered during the PY 2002 program planning process, after the Commission has received and reviewed the Reporting Requirements Manual Working Group report on cost-effectiveness standards for measure selection. We also extend the filing dates for certain deliverables required by this decision and correct inconsistencies in due dates that appeared in the draft decision. In addition, we clarify how we intend to apply the standardized methodology for estimating CARE penetration rates to the CARE Outreach Pilot results.

Findings of Fact

1. LIAB solicited public input on its recommendations in this proceeding, but did not follow the guidelines set forth by the Assigned Commissioner for the content of this filing.

2. For the most part, LIAB's recommendations for PY 2001 are duplicative of efforts underway, premature, lack sufficient clarity, are in conflict with recent Commission determinations, or do not represent high priority modifications of policies or programs for our consideration. In particular, LIAB's recommendations for improving program evaluation and oversight do not acknowledge current and developing reporting requirements for the utilities, the work of existing measurement and evaluation groups in this and other Commission proceedings, or the Standardization Project, Outreach Pilot, Attic Ventilation Pilot and Needs Assessment Study currently underway. None of the parties commenting on LIAB's recommendations proposed additional or alternate high priority modifications to policies, program designs or funding levels for PY 2001 LIEE programs.

3. There is a lack of standardization in CARE application forms and in the calculation of CARE penetration rates. These issues are not currently being addressed in the Standardization Project.

4. Low-income customers who receive assistance via the utilities' CARE and LIEE programs would benefit from receiving a standardized customer "bill of rights," including a description of the consumer complaint process.

5. LIAB's proposal for independent auditing requirements does not present or weigh the costs of that proposal in resources and manpower, or consider alternate approaches for improving program monitoring. The filings in this proceeding also do not describe current utility procedures (audits, process evaluations, polls, etc.) for monitoring program quality, cost-efficiency and customer satisfaction in low-income assistance programs.

6. The results of the Attic Ventilation Pilots will provide information needed for evaluating the cost-effectiveness of attic ventilation as a stand-alone measure.

7. In order to evaluate the results of the Outreach Pilot for PY 2002, the utilities need to have tracking systems in place throughout the pilot period.

8. The Standardization Project is an appropriate forum for considering LIAB's Specific Program Recommendations 20, 21 and 28.

9. By creating a standardized WIS manual and a consistent set of installation and other procedures, we believe that the recommendations contained in the Phase 1 Standardization Report will improve the implementation of LIEE programs.

10. Assigning specific tasks to LIAB and focusing advisory committee activities to those assigned tasks, will help ensure that program and Commission resources are most effectively and efficiently utilized. Transferring the task of nominating Board members and producing annual operating budgets from LIAB to Energy Division is an effective way to further conserve program resources.

11. To accomplish its current assignments, as clarified by this decision, LIAB and its advisory committee should be able to substantially reduce the number of scheduled meetings.

12. Allowing LIAB members to serve on CALMAC, even as non-voting members, could place them in the inconsistent role of becoming a party in Commission proceedings.

13. LIAB can best fulfill its independent advisory role if its Board members do not also serve on other committees or working groups that address low-income assistance issues.

14. No program design changes or modifications to measure eligibility have been recommended to the Commission as part of the Standardization Project (Phase 1) or in comments on that report.

15. There is insufficient time and resources to go beyond the Phase 1 Standardization Report and implement a compliance phase that would consider new proposals for measure eligibility in PY 2001. Delaying the final approval of eligible measures would also create an unacceptable delay for utilities that are in the process of issuing a Request For Proposals to select new PY 2001 program implementors. Moreover, evaluating proposals to add or delete measures prior to our consideration of the Working Group report would undermine (and prejudice) our efforts to standardize evaluation and reporting efforts for the LIEE program.

16. No further Commission action is necessary to extend the current programs through 2001 since that extension was authorized in D.00-07-020.

17. The Working Group report will be available in time for the Commission's consideration of the recommendations (and any nonconsensus positions) during the PY 2002 program planning cycle.

Conclusions of Law

1. For the reasons discussed in this decision, LIAB's May 19, 2000 Recommendations On PY 2001 CARE and LIEE Programs should not be adopted.
2. The joint recommendations for standardizing installation standards and other procedures for the LIEE program, as presented in the Phase 1 Standardization Report, are reasonable and should be approved and the recommendations on cost-effectiveness should be accepted for further consideration by the Working Group, as discussed in this decision. Within 30 days of the effective date of this decision, the utilities should jointly file the new WIS manual in this proceeding which incorporates the follow-up recommendations submitted on July 5, 2000. The utilities should serve a notice of its availability to all appearances and the state service list in this proceeding. This new manual should be used by the utilities in designing their PY 2001 programs, and will be the standard used for all installations in the utility programs beginning January 1, 2001.
3. Within 60 days from the effective date of this decision, the utilities should file compliance applications that present the following:
 - (a) A joint proposal to standardize the calculation of CARE penetration rates, reflecting any consensus reached by the Reporting Requirements Manual Working Group.
 - (b) A description of current utility procedures (audits, process evaluations, polls, etc.) for monitoring program quality, cost-efficiency and customer satisfaction and recommendations for improving these procedures or instituting alternative ones, along with the associated costs and manpower requirements.
 - (c) Recommendations regarding stand-alone attic ventilation based on the results of the Attic Ventilation Pilot, and

- (d) A description of how the utilities will be tracking the results of the Outreach Pilot so that those results can be evaluated during the PY 2002 program planning cycle.

4. As discussed in this decision, the utilities should prepare a standardized customer “bill of rights,” which includes a description of the consumer complaint process. The utilities should include in their filing a description of how they will disseminate the “bill of rights” to customers. This effort should be coordinated with Phase 2 of the Standardization Project, where policies and procedures are to be standardized across utilities. The utilities should jointly develop this document with public input, and present them for approval no later than the filing of their PY 2002 program applications.

5. The utilities should also work toward the development of a form that requests the same types and categories of data from all customers enrolling in CARE. The utilities should jointly develop such forms with public input and present them in an Advice Letter filing by March 1, 2001.

6. The utilities and other members of the Standardization Project team should explore LIAB’s Specific Program Recommendations 20, 21 and 28 during the ongoing development of standardized policies and program procedures. As discussed in this decision, if the utilities are in opposition to conforming qualification guidelines to the state and federal rules, they should describe in detail how they plan to coordinate with other programs so that the low-income customer receives as many of the weatherization measures as are feasible for each eligible low-income dwelling unit.

7. Phase 2 and 3 recommendations by the Standardization Project team should be completed in time for our consideration during the PY 2002 program planning cycle, or sooner if possible.

8. As discussed in this decision, LIAB should meet only when assigned specific tasks by the Commission, which currently are comprised of the following:

- (a) filing comments on the proposal of the Reporting Requirements Manual Working Group to standardize the reporting requirements and administrative costs of the low-income assistance programs, and
- (b) providing input to the utilities on utility proposals for producing standardized data on bill savings and expenditures for LIEE programs on an overall program and per unit basis, per D.00-07-020.

To address these two issues, LIAB and its advisory committee should be able to substantially reduce the number of scheduled meetings. Based on current assignments, LIAB and its advisory committee should reduce their scheduled meetings to those occurring in October, 2000 and January, 2001. If LIAB desires to meet more frequently or perform additional tasks with the assistance of Commission resources, it must seek and receive approval from the Energy Division. If approval is not given, LIAB shall rely on non-Commission resources to complete any additional tasks or conduct additional meetings other than those directed by today's decision or subsequent Commission order. Such additional tasks or meetings that LIAB elects to undertake must be directly related to the utility low-income assistance programs under our jurisdiction. LIAB should prepare and submit to the Energy Division written minutes of any additional meetings and written reports on any additional activities that are undertaken without the assistance of the Energy Division.

9. LIAB Board members (as individuals) should not serve on CALMAC or on other working groups or committees that address low-income assistance issues.

10. As discussed in this decision, Energy Division should submit recommendations for Board member nominations and LIAB operating budgets.

11. In order to proceed expeditiously with the compliance applications, this order should be effective today.

INTERIM ORDER

IT IS ORDERED that:

1. The joint recommendations for standardizing installation standards and other procedures for the LIEE program, as presented in the Phase 1 Standardization Report are reasonable and are approved and the recommendations on cost-effectiveness are accepted for further consideration by the Working Group, as discussed in this decision. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company and Southern California Gas Company, collectively referred to as “the utilities,” shall jointly file the new Weatherization Installation Standards (WIS) manual in this proceeding which incorporates the Phase 1 report recommendations and follow-up recommendations submitted on July 5, 2000. The utilities shall serve a notice of its availability to all appearances and the state service list in this proceeding. This new manual shall be used by the utilities in designing their program year (PY) 2001 programs, and shall be the standard used for all installations in the utility programs beginning January 1, 2001.

2. As discussed in Section 6 of this decision, the Low-Income Advisory Board (LIAB) and its advisory committee(s) shall be assisted by Energy Division and other Commission resources only to accomplish the specific tasks assigned to LIAB by the Commission. If LIAB desires to meet more frequently or perform additional tasks with the assistance of Commission resources, it must seek and

receive approval from the Energy Division. If approval is not given, LIAB shall rely on non-Commission resources to complete any additional tasks or conduct additional meetings other than those directed by today's decision or subsequent Commission order. Such additional tasks or meetings that LIAB elects to undertake must be directly related to the utility low-income assistance programs under our jurisdiction. LIAB shall prepare and submit to the Energy Division written minutes of any additional meetings and written reports on any additional activities that are undertaken without the assistance of the Energy Division.

3. After LIAB completes its current assignments, LIAB should consider disbanding its advisory committee and convene workshops or working groups when LIAB receives further assignments from the Commission.

4. Within 60 days from the effective date of this decision, the utilities shall file compliance applications that present the following:

- (a) A standardized method for calculating California Alternate Rates For Energy (CARE) penetration rates, presented jointly by the utilities and reflecting any consensus reached by the Reporting Requirements Manual Working Group.
- (b) A description of current utility procedures (audits, process evaluations, polls, etc.) for monitoring program quality, cost-efficiency and customer satisfaction and recommendations for improving these procedures or instituting alternative ones, along with the associated costs and manpower requirements.
- (c) Recommendations regarding stand-alone attic ventilation based on the results of the Attic Ventilation Pilot, and
- (d) A description of how the utilities will be tracking the results of the Outreach Pilot so that those results can be evaluated during the PY2002 program planning cycle.

5. In coordination with Phase 2 of the Standardization Project, the utilities shall jointly develop a standardized customer “bill of rights” for low-income assistance programs, which includes a description of the consumer complaint process. The utilities shall describe how they will disseminate the “bill of rights” to customers. They shall develop this document with public input, and present them for approval no later than the filing of their PY 2002 program applications.

6. The utilities shall develop forms that request the same types and categories of data from all customers enrolling in CARE. The utilities shall jointly develop such forms with public input and file them in an Advice Letter filing by March 1, 2001.

7. As discussed in this decision, the utilities and other members of the Standardization Project team shall explore LIAB’s Specific Program Recommendations 20, 21 and 28 during the ongoing development of standardized policies and program procedures. Phase 2 and 3 recommendations shall be completed in time for our consideration during the PY 2002 program planning cycle, or sooner if possible.

8. By September 1 of each year, the Energy Division shall solicit and submit nominations for LIAB membership and prepare and submit the LIAB’s budget for the upcoming year. The Energy Division shall file its recommendations in the form of a report and serve all appearances and the state service list in this proceeding (or successor proceeding). Interested parties and the LIAB may file comments within 20 days thereafter.

9. All filings required by today's order shall be filed in the Commission's Docket Office and served on the appearances and state service list in this proceeding, or successor proceeding.

This order is effective today.

Dated September 7, 2000, at San Francisco, California.

LORETTA M. LYNCH
President
HENRY M. DUQUE
JOSIAH L. NEEPER
RICHARD A. BILAS
CARL W. WOOD
Commissioners

ATTACHMENT 1

***** APPEARANCES *****

Ron Knecht
ADVOCATES FOR THE PUBLIC INTEREST (API)
1465 MARLBAROUGH AVENUE
LOS ALTOS CA 94024-5742
(650) 968-0115
ronknecht@aol.com

Evelyn Kahl Elsesser
Attorney At Law
ALCANTAR & ELSESSER LLP
ONE EMBARCADERO CENTER, STE 2420
SAN FRANCISCO CA 94111
(415) 421-4143
eke@aelaw.com

Michael Alcantar
Attorney At Law
ALCANTAR & ELSESSER LLP
1300 SW 5TH AVENUE., SUITE 1750
PORTLAND OR 97201
(503) 402-8700
mpa@aelaw.com

Glynnis Jones
Vice President
APPLIANCE RECYCLING CNTRS OF AMERICA
PO BOX 163125
SACRAMENTO CA 95816
(916) 448-8385
GLYNNISJONES@EARTHLINK.NET

Barbara R. Barkovich
BARKOVICH AND YAP, INC.
31 EUCALYPTUS LANE
SAN RAFAEL CA 94901
(415) 457-5537
brbarkovich@earthlink.net

William F. Parker
President
BAY AREA POVERTY RESOURCE COUNCIL
930 BRITTAN AVENUE
SAN CARLOS CA 94070
(650) 595-1342
wparker@baprc.com

Tim Tutt
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-22
SACRAMENTO CA 95814

Karen Mills
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5655
kmills@cbbf.com

Ronald Liebert
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5657
rliebert@cbbf.com

Neal A. Johnson
CALIFORNIA INTEGRATED WASTE MGMT
BOARD
8800 CAL CENTER DRIVE
SACRAMENTO CA 95826-3268
(916) 255-2580
njohnson@ciwmb.ca.gov

Kevin Smith
Consultant
CALIFORNIA MANUFACTURERS ASSOCIATION
980 9TH STREET, STE 2200
SACRAMENTO CA 95814-2742
(916) 447-9401

Christopher S. Taylor
Action Assoc.
CALIFORNIA/NEVADA COMMUNITY
225 30TH STREET SUITE 200
SACRAMENTO CA 95816-3359

Maurice Brubaker
BRUBAKER & ASSOCIATES, INC.
1215 FERN RIDGE PARKWAY, STE 208
ST. LOUIS MO 63141
(314) 275-7007
mbrubaker@consultbai.com

Richard Shaw
CHASE SHANNON
PO BOX 469
FILLMORE CA 91305

Michael Yamada
CITY OF L.A. DEPT OF WATER AND POWER
ROOM 1534 GOB
PO BOX 111
LOS ANGELES CA 90051

Rita Norton
CITY OF SAN JOSE
777 N. 1ST STREET, SUITE 450
SAN JOSE CA 95112-6311
(408) 277-5533
rita.norton@ci.sj.ca.us
For: City of San Jose

Edward B. Lozowicki
Attorney At Law
COUDERT BROTHERS
303 ALMADEN BLVD, FIFTH FLOOR
SAN JOSE CA 95110-2721
(408) 297-9982
elozowicki@sjc.coudert.com

Ray Czahar
5650 GRAVENSTEIN HIGHWAY-RTE 116
NORTH
FORESTVILLE CA 95436
(707) 887-2522
rczahar@aol.com
Mark J. Berman
Director Of Business Development
DAVIS ENERGY GROUP
123 C STREET
DAVIS CA 95616

Joy Omania
Action Association
CALIFORNIA/NEVADA COMMUNITY
225 30TH STREET, SUITE 200
SACRAMENTO CA 95816

Eileen A. Koch
CALPINE CORPORATION
50 W. SAN FERNANDO ST.
SAN JOSE CA 95113

Jon S. Silva
Government Affairs Associate
EDISON SOURCE
955 OVERLAND COURT
SAN DIMAS CA 91773
(909) 450-6035
jsilva@edisonenterprises.com
For: Edison Enterprises

Renee H. Guild
ELECTRIC POWER RESEARCH INSTITUTE
PO BOX 10412
3412 HILLVIEW AVENUE
PALO ALTO CA 94304-1395
(650) 855-2000

Lynn M. Haug
Attorney At Law
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO CA 95814-3109
(916) 447-2166
lmh@eslawfirm.com
For: DEPT OF GENERAL SVCS.

Dan Kirshner
Senior Economic Analyst
ENVIRONMENTAL DEFENSE FUND
5655 COLLEGE AVE., SUITE 304
OAKLAND CA 94618
dank@edf.org
Beth Dunlop
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO CA 94104-5305
(415) 834-2300
bdunlop@gralegal.com
For: UC/CAL STATE U

Norman J. Furuta
Associate Counsel
DEPARTMENT OF THE NAVY
900 COMMODORE DRIVE
SAN BRUNO CA 94066-5006
(650) 244-2100
furutanj@efawest.navfac.navy.mil

Carolyn A. Baker
DUKE ENERGY NORTH AMERICA
980 NINTH STREET, 16TH FLOOR
SACRAMENTO CA 95814
(916) 449-9623
cabaker@duke-energy.com

Robert E. Burt
Executive Director
INSULATION CONTRACTORS ASSOCIATION
1911 F STREET
SACRAMENTO CA 95814
(916) 444-2950
bob.burt@macnexus.org

Carl Robert Aron
Exec. Vice President
ITRON, INC.
PO BOX 15288
2818 N. SULLIVAN ROAD
SPOKANE WA 99216
(509) 924-9900
carl.aron@itron.com

James Hodges
J. LAWRENCE COMMUNICATIONS
4720 BRAND WAY
SACRAMENTO CA 95819
(916) 451-7011
jlhodges@ibm.net
For: East Los Angeles Community Union

Norman A. Pedersen
Attorney At Law
JONES, DAY, REAVIS & POGUE
555 WEST FIFTH STREET, SUITE 4600
LOS ANGELES CA 90013-1025
(213) 243-2810
napedersen@jonesday.com

Charles J Hahn
611 ANTON BLVD SUITE 700
COSTA MESA CA 92626
For: Bentley Company

Jan Smutny-Jones
Association
INDEPENDENT ENERGY PRODUCERS
1112 I STREET, STE. 380
SACRAMENTO CA 95814-2896

William H. Booth
Attorney At Law
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, SUITE 500
WALNUT CREEK CA 94596
(925) 296-2460
wbooth@booth-law.com

Emilio E. Varanini, III
LIVINGSTON & MATTESICH
1201 K STREET, STE 1100
SACRAMENTO CA 95814
(916) 442-1111

Marc Mihaly
Attorney
396 HAYES STREET
SAN FRANCISCO CA 94102
For: LIGB

Sara Steck Myers
Attorney At Law
122 - 28TH AVENUE
SAN FRANCISCO CA 94121
(415) 387-1904
ssmyers@hooked.net

Tim Krause
PO BOX 519
CYPRESS CA 90630
For: Energx Controls, Inc.

Sheryl Carter
NATURAL RESOURCES DEFENSE COUNCIL
71 STEVENSON STREET, SUITE 1825
SAN FRANCISCO CA 94105
(415) 777-0220
scarter@nrdc.org

Luis Arteaga
ROXANNE FIGUEROA
LATINO ISSUES FORUM
785 MARKET ST., 3RD FL.
SAN FRANCISCO CA 94103

Thomas J. O'Rourke
O'ROUKE & COMPANY
44 MONTGOMERY STREET, RM 1705
SAN FRANCISCO CA 94104

Susan E. Brown
Attorney At Law
LATINO ISSUES FORUM
785 MARKET STREET, 3RD FLOOR
SAN FRANCISCO CA 94103-2003
(415) 284-7224

A. Y. Ahmed
OCCIDENTAL ANALYTICAL GROUP
1313 N GRAND AVENUE, STE 392
WALNUT CA 91789
For: Occidental Analytical Group

Richard Sperberg
President
ONSITE/SYCOM
701 PALOMAR AIRPORT ROAD RM 200
CARLSBAD CA 92009
(760) 931-2400
Rsperberg@onsitesycom.com

Doug Grandy
OFFICE OF ENERGY ASSESSMENTS
717 K STREET, SUITE 409
SACRAMENTO CA 95814

Robert B. McLennan
ROGER PETERS
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
POST OFFICE BOX 7442
SAN FRANCISCO CA 94120
(415) 973-2069
rbm4@pge.com

Don Wood
Public Policy Programs Supervisor
SAN DIEGO GAS & ELECTRIC
4539 LEE AVENUE
LA MESA CA 91941
(619) 536-4002
dwood@sdge.com

Blueley I. Anderson
POWER VALUE INCORPORATED
877 YGNACIO VALLEY ROAD, STE 105
WALNUT CREEK CA 94596
(510) 938-8735
sia2@pacbell.net

Yole Whiting
SAN DIEGO GAS & ELECTRIC CO.
BLDG. 4, ROOM 4226A
8306 CENTURY PARK COURT
SAN DIEGO CA 92123

Dennis Dobkowski
Clearing House, Inc.
RESIDENTIAL ENERGY EFFICIENCY
19896 FELICIA DRIVE
YORBA LINDA CA 92886

James F. Walsh
Attorney At Law
SAN DIEGO GAS & ELECTRIC COMPANY
PO BOX 1831
SAN DIEGO CA 92112
(619) 699-5039
jwalsh@sdge.com
For: San Diego Gas & Electric Company

Bryan Griess
RESOURCE MANAGEMENT INTERNATIONAL
3100 ZINFANDEL DRIVE, SUITE 600
SACRAMENTO CA 95852-1516
bryangriess@rmiinc.com

Roberto Haro
Cesar E Chavez Institute For Pub Policy
SAN FRANCISCO STATE UNIVERSITY
1600 HOLLOWAY AVENUE
SAN FRANCISCO CA 94132
(415) 338-6044
chavezin@sfsu.edu
For: Low Income Governing Board

Roxanne Figueroa
RICHARD HEATH AND ASSOCIATES, INC.
604 BANCROFT WAY
BERKELEY CA 94710
(510) 649-1464
rfigueroa@rhainc.com
For: Latino Issues Forum

Steven R. Schiller
PHILLIP HASLEY
Principal
SCHILLER ASSOCIATES
1333 BROADWAY, SUITE 1015
OAKLAND CA 94612
(510) 444-6500
steves@schiller.com

Robert Mowris
ROBERT MOWRIS & ASSOCIATES
10 RIDGE LANE
ORINDA CA 94563

Jeff Schlegel
1167 SAMALAYUCA DRIVE
TUCSON AZ 85704-3224
schlegelj@aol.com
For: Consultant to CBEE
Lynn G. Van Wagenen
Regulatory Affairs Project Manager
SEMPRA ENERGY
101 ASH STREET, ROOM 10A
SAN DIEGO CA 92101
(619) 699-4055
LVanWagenen@sempra.com

Dana S. Appling
General Counsel
SACRAMENTO MUNICIPAL UTILITY DISTRICT
LEGAL DEPARTMENT MSB406
PO BOX 15830
SACRAMENTO CA 95852-1830
(916) 732-6126

Michael Rochman
Managing Director
SPURR
1430 WILLOW PASS ROAD, SUITE 240
CONCORD CA 94520
(925) 743-1292
rochmanm@spurr.org

Vicki Thompson
Attorney At Law
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO CA 92101
(619) 699-5130
vthompson@sempra.com
For: SDG&E and Southern California Gas
Company

Keith R. Mccrea
Attorney At Law
SUTHERLAND, ASBILL & BRENNAN LLP
1275 PENNSYLVANIA AVE., N.W., SUITE 800
WASHINGTON DC 20004-2415
(202) 383-0705
kmccrea@sablalaw.com
James E. Scarff
Legal Division
RM. 5121
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1440
jes@cpuc.ca.gov

Richard Esteves
SESCO, INC.
77 YACHT CLUB DRIVE, RM 1000
LAKE FOREST NJ 07849
(973) 663-5125
sesco-lf@att.net
Rich Ferguson
SIERRA CLUB
SUITE 300
1100 11TH STREET, SUITE 300
SACRAMENTO CA 95814

Frank J. Cooley
LAURA LARKS
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-3115
cooleyfj@sce.com
For: Southern California Edison Company

Frank A. Spasaro
Dsm Transition Manager
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, ML-22E2
LOS ANGELES CA 90013-1011
(213) 244-3648
fspasaro@socalgas.com

Patrick Petersilia
Director Consumer Marketing
SOUTHERN CALIFORNIA GAS COMPANY
555 W FIFTH STREET
LOS ANGELES CA 90013-1011
For: Southern California Gas Company

Denis Turner
SOUTHERN CALIFORNIA TRIBAL CHAIRMEN
PO BOX 1470
VALLEY CENTER CA 92082
(760) 749-0910
sctca@inetworld.net
For: Southern California Tribal Chairmen's
Association

Carl Blumstein
Energy Institute
UNIVERSITY OF CALIFORNIA BERKELEY
2539 CHANNING WAY
BERKELEY CA 94720

Linda Williams
UTILITY REFORM PROJECT
10266 S.W. LANCASTER ROAD
PORTLAND OR 97219

Leslie Abrams
THE GREENLINING INSTITUTE
785 MARKET ST., 3RD FLOOR
SAN FRANCISCO CA 94103
(415) 284-7219
leslie@greenlining.org
For: Greenlining Institute

Marcel Hawiger
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876
marcel@turn.org
For: TURN

Robert Finkelstein
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876
bfinkelstein@turn.org

Donald W. Aitken, Ph.D.
Senior Scientist, Energy Program
UNION OF CONCERNED SCIENTISTS
2397 SHARTUCK AVENUE, SUITE 203
BERKELEY CA 94704
(510) 843-1872
donaldaitken@earthlink.net

Lee Riggan
VENTURA COUNTY COMMISSION ON
CONCERNS & COMMUNITY DEVELOPMENT
621 RICHMOND AVENUE
OXNARD CA 93030
(805) 486-4725
rigganl@earthlink.net
For: Ventura County Commission on Human
Concerns, Concerns & Community Development
Philip M. Vermeulen
1335 RIDGEDALE COURT
ROSEVILLE CA 95661
(916) 784-7055
pmvgov@tomatoweb.com
For: Service Institute

Sam De Frawi
WASHINGTON NAVY YARD
1314 HARWOOD STREET, SE
WASHINGTON DC 20374-5018
(202) 685-0130
defrawis@efaches.navfac.navy.mil
***** **STATE EMPLOYEE** *****

Zaida Amaya-Pineda
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1109
zca@cpuc.ca.gov

Bruce Cenicerros
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-42
SACRAMENTO CA 95814-5512
(916) 653-1590

Michael Messenger
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-42
SACRAMENTO CA 95184
(916) 654-4774
mmesseng@energy.state.ca.us

Henry Knowls
COUNTY OF LOS ANGELES
DEPT. OF COMMUNITY & SENIOR SERVICES
3175 WEST 6TH STREET RM 200
LOS ANGELES CA 90020
(213) 738-2644
hknowls@co.la.ca.us

Timothy M. Dayonot
DEPT. OF COMMUNITY SERVICES AND DEV.
700 NORTH TENTH STREET RM 258
SACRAMENTO CA 95814-0338
(916) 322-2940

Meg Gottstein
21496 NATIONAL STREET
PO BOX 210
VOLCANO CA 95689
gottstein@volcano.net

Wallis J. Winegard
WINEGARD ENERGY
1806 FLOWER AVENUE
DUARTE CA 91010

David Abelson
Attorney At Law
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-14
SACRAMENTO CA 95184
(916) 654-3951

David Hungerford
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO CA 95814
(916) 654-4906
dhungerf@energy.state.ca.us

Monica Rudman
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 42
SACRAMENTO CA 95184-5512

Robert C. Cagen
Legal Division
RM. 5124
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2197
rcc@cpuc.ca.gov

Darwin Farrar
Legal Division
RM. 5039
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1599
edf@cpuc.ca.gov
Anne W. Premo
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1247
awp@cpuc.ca.gov
For: CPUC-ENERGY DIVISION

Meg Gottstein
Administrative Law Judge Division
RM. 5044
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-4802
meg@cpuc.ca.gov

Judith Ikle
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1486
jci@cpuc.ca.gov

Maurice Monson
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3072
mdm@cpuc.ca.gov

Barbara A. Morton
Information & Management Services Divisi
RM. 2004
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3066
bam@cpuc.ca.gov

Nancy Brockway
NATIONAL CONSUMER LAW CENTER, INC.
18 TREMON STREET, SUITE 400
BOSTON MA 02108

Barbara Ortega
Executive Division
RM. 500
320 WEST 4TH STREET SUITE 500
Los Angeles CA 90013
(213) 576-7070
bho@cpuc.ca.gov

John P. Rozsa
Senate Energy Advisor
STATE CAPITOL, ROOM 408
SACRAMENTO CA 95814

Stephen J. Rutledge
Consumer Services Division
RM. 2206
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1428
sjr@cpuc.ca.gov

Ulla Maija Wait
Dept. Of Community Svcs & Dev.
STATE OF CALIFORNIA
700 NORTH 10TH ST., ROOM 258
SACRAMENTO CA 95814-0338

Don Schultz
Office of Ratepayer Advocates
RM. SCTO
770 L STREET, SUITE 1050
Sacramento CA 95814
(916) 327-2409
dks@cpuc.ca.gov
Thomas W. Thompson
Office of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2881
ttt@cpuc.ca.gov

Jonathan P. Tom
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1809
jpt@cpuc.ca.gov

Ourania M. Vlahos
Legal Division
RM. 5125
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2387
omv@cpuc.ca.gov

Phyllis R. White
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1955
prw@cpuc.ca.gov

Josie Webb
Office of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2247
wbb@cpuc.ca.gov

Helen W. Yee
Legal Division
RM. 5031
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2474
yee@cpuc.ca.gov

(END OF ATTACHMENT 1)

**ATTACHMENT 2
(LIST OF ACRONYMS)**

ALJ	Administrative Law Judge
CALMAC	California Measurement Advisory Council
CARE	California Alternate Rates for Energy
CBEE	California Board for Energy Efficiency
CBOs	Community-based Organizations
CSD	California Department of Community Services Development
LIAB	Low-Income Advisory Board
LIEE	Low-Income Energy Efficiency
LIGB	Low-Income Governing Board
ORA	Office of Ratepayer Advocates
PG&E	Pacific Gas and Electric Company
PY	Program Year
RER	Regional Economic Research, Inc.
RFP	Request for Proposal
RHA	Richard Heath & Associates
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric Company
SoCal	Southern California Gas Company
WIS	Weatherization Installation Standards
Working Group	Reporting Requirements Manual Working Group

(END OF ATTACHMENT 2)